

4.0 ENVIRONMENTAL CONSEQUENCES

This section analyzes the environmental consequences that would result from implementation of each of the alternatives identified in Chapter 2 for the proposed Federal Bureau of Investigation (FBI) building. Environmental consequences can be categorized and presented in many ways, including the following:

- Direct impacts of implementing an action
- Indirect impacts, occurring in combination with other influences, that may occur at a later time or at some distance from the activity
- Short-term or temporary impacts
- Long-term or permanent impacts
- Adverse impacts
- Beneficial impacts
- Cumulative impacts

To determine whether an impact is significant, the Council on Environmental Quality (CEQ) regulations also requires the consideration of context and intensity of the potential impacts (40 Code of Federal Regulations (CFR) 1508.27). Context normally refers to the setting, whether local or regional, and intensity refers to the severity of the impact.

Pursuant to the CEQ regulations, criteria considered for determining significance of impacts have been established for each resource and are presented for each resource section. If any project activity would exceed one of these criteria, the impact is considered significant. Impacts are defined in the following categories:

- Significant and Unavoidable Impact – Impact that exceed the defined significance criteria and cannot be reduced or eliminated to a less-than-significant level through the implementation of mitigation measures
- Significant Impact – Impact that exceeds the defined significance criteria. Pre-mitigation impacts that exceed the defined significance criteria are referred to as significant; however, when the impact cannot be reduced or eliminated through mitigation, these impacts are considered as significant and unavoidable
- Potentially Significant Impact – Impact that exceeds the defined significance criteria and can be reduced or eliminated through implementation of mitigation measures
- Less-Than-Significant Impact – Impact that does not exceed the defined significance criteria

This chapter presents the issues in the same order as the Affected Environment Chapter. Table 4-1 summarizes the environmental consequences by the significance of the impact.

4.1 LAND USE

The analysis in this section focuses on the compatibility of land uses with existing and planned land uses within and adjacent to the Wilshire campus, as well as consistency with any applicable land use plans, policies, or regulations. This section is divided into two subsections, Land Use Compatibility and Consistency with Land Use Plans and Policy.

4.1.1 Land Use Compatibility

This subsection assesses the alternatives' compatibility with adjacent uses (i.e., whether or not the alternative's physical characteristics or activities will prevent or substantially impair the function of those uses) and their consistency with land use patterns in the surrounding area.

Table 4-1
ENVIRONMENTAL CONSEQUENCES SUMMARY MATRIX

Resources	Alternative 1		Alternative 2		No Action	
	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
Land Use	II	II	II	II	II	II
Visual and Aesthetics	III	II	III	I	II	II
Socioeconomics						
Demographics	II	II	II	II	II	II
Employment and Commercial Activity	I	I	I	II	I	I
Real Estate & Socioeconomics	I	II	II	II	II	II
Traffic & Parking						
Traffic	III	VI	III	I	II	II
Parking	II	II	II	II	II	II
Physical Environmental						
Geology & Landform	III	II	III	II	II	II
Hydrology & Water Quality	III	II	III	II	II	II
Vegetation & Wildlife	II	II	II	II	II	II
Air Quality	III	II	III	II	II	II
Noise	III	II	III	II	II	II
Cultural Conditions						
Archaeological Resources	II	II	II	II	II	II
Historic Resources	II	II	II	II	II	II
Public Services						
Police Protection	II	II	II	II	II	II
Fire Protection	II	II	II	II	II	II
Public Utilities						
Electricity	II	II	II	II	II	II
Natural Gas	II	II	II	II	II	II
Solid Waste	II	II	II	II	II	II
Water Supply	II	II	II	II	II	II
Wastewater	II	II	II	II	II	II
Hazardous Materials	III	II	III	II	III	II

KEY

- I The impact is beneficial
- II There are no adverse impacts
- III There is an impact, but it is not significant
- IV The impact has the potential to be significant, but mitigable
- V The impact is significant, but mitigable
- VI The impact is significant

4.1.1.1 Significance Criteria

For purposes of this environmental impact statement (EIS), significant adverse impacts to land use compatibility would result in any of the following:

- Result in disruption, division, or isolation to existing neighborhoods, communities, or land uses
- Result in land use incompatibilities between project development and adjacent community land uses
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal

program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect

4.1.1.2 Alternative 1: Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage

The proposed development is only within the existing boundaries of the Federal property; therefore, no impacts related to the division of an established community would occur.

The proposed development represents an approximately 144 percent increase over the existing built environment of approximately 809,000 gross square feet (GSF) currently on site. This alternative is located within the context of a highly developed urban area that has grown in a manner consistent with the general urbanization of the region.

Because the Wilshire campus interfaces with adjacent land uses to varying degrees, development of additional buildings could result in a land use compatibility impact depending on the type of land use, as well as the location, mass, and/or height of any new structures. Other design features, such as building massing, could result in an appearance of greater density in a given location, which could affect immediately adjacent low-density land uses.

The location of the new facilities would likely be in the southwest quadrant of the property and within the boundaries of the Wilshire campus on the site of the existing parking garage and adjacent surface parking lots. The proposed new parking garage would be located along the southern boundary adjacent to the Westwood Community Park in the general vicinity of the existing parking garage. Consistent with current conditions, continued provision of a landscaped buffer along the southern edge of the campus will visually and spatially separate the proposed parking garage from the adjacent park. No changes to the facilities located along the eastern and northern boundaries are expected; therefore, no impacts to the adjacent residential areas to the east are expected. No changes to the facilities located along the eastern and northern boundaries are expected; therefore, no land use impacts to the adjacent residential areas to the east will occur. The west side of the property is separated by Sepulveda which buffers the site from the VA Soldier's housing, which is an institutional use.

The current facility is on Federal property and is not subject to municipal regulations, such as County and City general plans as noted in Section 3.1.3.1. The Wilshire campus is in the unincorporated section of Los Angeles County and zoned Institutional. Implementation of Alternative 1 would be consistent with the adjacent Westwood Community Planning Area master plan that has existing and planned commercial development along Wilshire Boulevard.

Summary of Impacts. There are no short-term or long-term adverse impacts to land use associated with the development of Alternative 1. The direct impact would be additional commercial development with ancillary parking which would be a continuation of the existing and proposed commercial land use along the south side of Wilshire Boulevard east of the project site. This is consistent with the Westwood Community Planning Area land use plans. There are no indirect impacts to land use. No mitigation would be required for land use as the proposed development is compatible with unincorporated Los Angeles County plan for this area.

4.1.1.3 Alternative 2: FBI Only - Two New Buildings + USPO + New Parking Garage

As with Alternative 1, Alternative 2 is within the existing boundaries of the Federal property; therefore, no effects related to the division of an established community would occur.

Alternative 2 represents an approximately 72 percent increase over the existing built environment of approximately 809,000 GSF. This alternative is also located within the context of a highly developed urban area that has grown in a manner consistent with the general urbanization of the region. Under this alternative, the 17-story office tower and cafeteria buildings would be demolished after Phase 1 of the proposed development is constructed.

Land use impacts for Alternative 2 would be the same as for Alternative 1 with the exception that there ultimately would be more open space along the northern portion of the property where the existing 17-story office tower is located.

Summary of Impacts. The impacts resulting from implementation of Alternative 2 are the same as for Alternative 1; see Section 4.1.1.2 for further details.

4.1.1.4 No Action Alternative

Under the No Action Alternative, the FBI and non-FBI Federal tenants would continue to be housed in the existing Wilshire campus. Implementation of the No Action Alternative would remain consistent with local land use for this site designated by Los Angeles County as unincorporated area, institutional uses.

4.1.1.5 Mitigation Measures

Alternatives 1 and 2 would not result in a significant adverse impact to land use; therefore, no mitigation measures are required.

4.1.2 Consistency with Southern California Association of Governments (SCAG) Regional Comprehensive Plan

This section describes consistency between the proposed alternatives and the applicable sections of regional plans. The regional plans include the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP), the Los Angeles Water Quality Control Plan for the Los Angeles Region (California Regional Water Quality Control Board, Los Angeles Region, 1995), and the Air Quality Management Plan (AQMP) (South Coast Air Quality Management District 1997 and 1999). The following sections provide a consistency analysis between the regional plans and the proposed alternatives.

4.1.2.1 Regional Comprehensive Plan

SCAG, a Federally-designated Metropolitan Planning Organization for six southern California counties, develops plans for transportation, growth management, and air quality. SCAG develops demographic projections and integrated land use, housing, employment, and transportation programs, measure and strategies portions of the South Coast Air Quality Management Plan.

SCAG also prepares the RCP which is currently being updated and serves as a framework to guide decision-making with respect to growth and changes anticipated through 2030. This RCP is built around the "Compass Growth Vision and 2% Strategy" adopted by the Regional Council in April 2004. The recommendations made within each chapter are comprised of infrastructure and resource activities consistent with the envisioned growth pattern. The RCP will feature nine chapters; each based on a specific area of planning or resource management (SCAG, 2006).

Applicable policies of the current RCP are discussed next.

Growth Management Chapter (GMC)

- *Policy 3.01: The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.*

Consistency Analysis. The project is not expected to substantially increase population, housing, or employment growth within the City of Los Angeles Subregion. The SCAG projected population, housing, and employment growth within the Subregion by 2025 is 6.3 million, 2.1 million, and 2.7 million, respectively (SCAG, 2004). The proposed project only involves the relocation of the job site within the Subregion. Therefore, implementation of the project would not interfere with SCAG's ability to utilize its regional population, housing, and jobs forecast by proposing development that SCAG has not considered.

- *Policy 3.05: Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

Consistency Analysis. Infrastructure systems are in place at the Wilshire campus, and beyond, to serve current and planned development. Construction of the proposed facilities would require only basic service connections to the existing electricity delivery infrastructure and would, therefore, minimize costs associated with infrastructure construction. Section 4.7 of this document more fully describes the specific infrastructure systems requirements.

- *Policy 3.12: Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

Consistency Analysis. The Wilshire campus is located adjacent to Interstate 405 and Wilshire Boulevard, both major transportation corridors. The campus is within a few miles of both Interstate 10 and the 101 Freeway, major east/west freeways. All of the highways serve to connect the campus with the broader geographic region outside of the Los Angeles area.

Wilshire Boulevard is well served by public transportation services. The Metropolitan Transit Authority (MTA) and several other municipal transit providers operate a number of routes to and around West Los Angeles. The transit operators serving the Wilshire campus include:

- Los Angeles County Metropolitan Transportation Authority – MTA (2 bus routes; Red Line Subway)
- Santa Monica Municipal Bus Line (1 express route operates all day)
- Culver City Bus Line (1 express route operates all day)
- Los Angeles Department of Transportation – LADOT, which operates Commuter Express service (1 route)

Public transit is located within one block of the Wilshire campus. Regional connectivity is also provided via connections with the Metro Red Line. Additional public transportation services are provided by taxicabs available at Taxi stands. See additional information in Section 4.3 and Appendix C.

- *Policy 3.18: Encourage planned development in locations least likely to cause environmental impact.*

Consistency Analysis. The Wilshire campus is located in the midst of a highly developed urban environment. Development of 937,000 GSF occupied building space would occur entirely within the

campus boundaries. All of the mitigation measures identified in this EIS are designed to reduce environmental impacts to the maximum extent feasible. The proposed project is consistent with this policy.

- *Policy 3.22: Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

Consistency Analysis. Implementation of the proposed project would result in the construction of new facilities on the Wilshire campus, an area where seismic hazards could occur. However, preparation of a site-specific geotechnical study (including engineering recommendations to mitigate potential seismic-related impacts) would further reduce this impact. Compliance with the International Building Code (IBC, 2003) would also minimize the effects of strong ground shaking by designing the new buildings to specified design requirements. There are no areas of high fire hazard, steep slopes, or flooding on the Wilshire campus. Therefore, implementation of the proposed project would be consistent with this policy as further described in Section 4.4.1 (Geology and Soils) of this document.

- *Policy 5.11. Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

Consistency Analysis. This EIS addresses air quality, land use, and traffic and economic impacts resulting from construction and operation of the proposed project and considers all relevant planning documents, such as the Air Quality Management Plan and the Congestion Management Program.

4.1.2.2 Regional Water Quality Control Board, Water Quality Control Plan (Los Angeles Basin Plan)

Consistency with the Clean Water Act (CWA) is demonstrated through compliance with the National Pollutant Discharge Elimination System (NPDES) permit process, as well as all regulations promulgated by the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs). Responsibility for the protection of water quality in California rests with the SWRCB and nine RWQCBs.

The Los Angeles Basin Plan, implemented by the Los Angeles RWQCB, specifically: 1) designates beneficial uses for surface and ground waters; 2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy; and, 3) describes implementation programs to protect all waters in the Region (RWQCB, 1994). Stormwater runoff from the Wilshire campus originates upstream from the Stone Canyon watershed and eventually flows to Ballona Creek and into Santa Monica Bay. The Basin Plan has specific designated water quality objectives for the Santa Monica Groundwater Basin where the project is located. As noted in Section 3.5.2, the campus is not a significant source of groundwater recharge, but is required to comply with all applicable water quality requirements established by the Los Angeles RWQCB and SWRCB.

Major pollutants found in runoff from urban areas include sediment, nutrients, oxygen-demanding substances, road salts, heavy metals, petroleum hydrocarbons, pathogenic bacteria, and viruses. Suspended sediments constitute the largest mass of pollutant loadings to receiving waters from urban areas. Construction is a major source of sediment erosion. Petroleum hydrocarbons result mostly from automobile sources. Nutrient and bacterial sources include garden fertilizers, leaves, grass clippings, pet wastes, and faulty septic tanks. As population densities increase, a corresponding increase occurs in pollutant loadings generated from human activities. Many of these pollutants enter surface waters via runoff without undergoing treatment (SWRCB, 2004a).

The NPDES permit system regulates both point source discharges and non-point source discharges to the surface waters of the United States. One of the primary objectives of the NPDES program is reducing pollutants in urban stormwater discharge to the maximum extent practicable through the use of structural and non-structural Best Management Practices (BMPs). Construction activities such as grading and excavation of an area larger than one acre require a General Permit for Discharges of Storm Water Associated with Construction Activity (SWRCB, 2004b).

As noted in Section 4.4.2, the project would develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which lists the BMPs that would be used to protect storm water runoff and the placement of those BMPs. Erosion control plans in compliance with NPDES requirements will be prepared prior to construction. These measures ensure consistency with the NPDES permit process. Therefore the proposed project would be in compliance with the NPDES requirements.

4.1.2.3 South Coast Air Quality Management District (SCAQMD), Air Quality Management Plan (AQMP)

The SCAQMD is directly responsible for reducing emissions to the air from stationary, mobile, and indirect sources within the South Coast Air Basin. Every three years, SCAQMD prepares an overall plan for the air quality improvement. Each iteration of the plan is an update of the previous plan and has a 20-year horizon. The Final 2003 AQMP was adopted by the AQMD Governing Board on August 1, 2003. (SCAQMD, 2003b)

The 2003 AQMP updated the attainment demonstration for the Federal standards for ozone and particulate matter (PM₁₀), replaced the 1997 attainment demonstration for the Federal carbon monoxide (CO) standard and provided a basis for a maintenance plan for CO for the future, and updated the maintenance plan for the Federal nitrogen dioxide (NO₂) standard that the South Coast Air Basin (Basin) has met since 1992 (SCAQMD, 2003b).

Determining consistency with the AQMP is to ascertain how a project accommodates the expected increase in population or employment. Generally, if a project is planned in a way that results in the minimization of vehicle miles traveled, both within the project and the community in which it is located, and consequently the minimization of air pollutant emissions, that aspect of the project is consistent with the AQMP.

As noted previously in discussion the proposed project represents infill development on an existing property, utilizing existing infrastructure and public service systems. The Wilshire campus is centrally located to activity centers throughout the region, connected by an extensive transportation network. Additional information on Air Quality is located in Section 4.4.4.

4.2 VISUAL AND AESTHETICS

As noted in Section 3.2, the Wilshire campus is located in an area of intense urbanization. Because of the building's setbacks from Wilshire Boulevard and Veteran Avenue, the campus provides relief from the adjacent development east along Wilshire where buildings are directly adjacent to the streets. The Westwood Community Park to the south provides an additional buffer between the Wilshire campus buildings and the residential areas to the south.

4.2.1 Significance Criteria

For purposes of this environmental impact statement (EIS), implementation of the proposed action may have a significant adverse impact on the visual setting if it would result in any of the following:

- Create shadows onto public spaces or residences

- Block views to natural or scenic vistas

4.2.2 Alternative 1: Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage

This alternative would locate the building near the southwest corner of the 28-acre site, covering an approximate 10-acre area where the existing parking lot and parking garage now exist. The new office buildings will not be as tall as the existing office tower and the new parking garage may be constructed above and below ground.

Because the new facilities are located north of the Westwood Community Park there will not be any shadows caused by the buildings to fall onto the park. Similarly, because the buildings will be on the west side of the 28-acre site, there will not be any shadows onto residential properties across Veteran Avenue to the east.

Views from the Westwood Community Park looking to the Wilshire campus are buffered by a row of trees along the property line and this will be continued as part of this alternative. While the trees will be in place, the proposed structures would likely be visible above the tree line when viewed from the southern area of the park, similar to the view of the existing office tower. This would not be inconsistent with the views to the northeast from the park and all the office towers along Wilshire Boulevard as noted in Section 3.2, Photo 3-6. No significant adverse impacts from shadows or the blocking of views to scenic or natural vistas have been identified.

During construction, the visual setting would undergo temporary changes. Large cranes, earth moving equipment, and construction materials would be observed on the Wilshire campus. Fencing would be placed around the construction areas for safety. These changes can be distracting to people driving in the area, visiting the National Cemetery or Westwood Community Park, and residents along Veteran Avenue. The visual impacts due to construction are considered temporary, but not significant.

4.2.3 Alternative 2: FBI Only - Two New Buildings+ USPO+ New Parking Garage

The impacts for Alternative 2 would be similar for Alternative 1 with regards to the new construction. There would be a change to the views from the Westwood Community Park and residential properties along Veteran Avenue as a result of the demolition of the 17-story office tower and cafeteria. The demolition would have a twofold effect: (1) removal of building that has been part of the visual landscape for over 35 years and (2) creating more open space along Wilshire Boulevard and Veteran Avenue because the new buildings will be further away from both streets than the existing office tower. Construction impacts would also be similar to Alternative 2.

4.2.4 No Action Alternative

There would be no change to the visual setting of the area under the No Action Alternative.

4.2.5 Mitigation Measures

Even though no significant impacts have been identified, there are steps that GSA will initiate during the design of the project that apply to Alternative 1 and Alternative 2. GSA will employ its Design Excellence Program in the development of this project. This program provides for the selection of quality architects, outside peer review to improve architectural designs, and encourage active participation from the local communities near the project.

4.3 SOCIOECONOMICS

The focus of this section is on demographics (population and housing) and real estate.

4.3.1 Demographics

This analysis considers population and household growth that would occur with implementation of the alternatives and whether this growth is within regional forecasts and / or whether it would result in the displacement of housing or people.

4.3.1.1 Significance Criteria

For purposes of this EIS, implementation of the project may have a significant adverse impact on population and housing if it would result in any of the following:

- Induce substantial population growth in an area, either directly or indirectly
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere

4.3.1.2 Alternative 1: Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage

Implementation of Alternative 1 would not directly affect or displace any existing residents or housing. Also, few if any, employees currently employed at the existing remote facilities would need to relocate their residences in order to work at the proposed site.

Implementation of both phases of Alternative 1 will increase the number of employees working at the Wilshire campus by 98 percent when compared to the No Action Alternative.

4.3.1.3 Alternative 2: FBI Only - Two New Buildings + USPO + New Parking Garage

Implementation of Alternative 2 would not directly affect or displace any existing residents or housing. Also, few if any, employees currently employed at the existing remote facilities would need to relocate their residences in order to work at the proposed site.

The relocation of employees from the 11 leased spaces to a new Federal facility would, however, make the vacated facilities available to the market.

Implementation of both phases Alternative 2 will decrease the number of employees working at the Wilshire campus by 14 percent when compared to the No Action Alternative.

4.3.1.4 No Action Alternative

Implementation of the No Action Alternative would not displace current residents, displace existing housing or create demand for housing that could not be accommodated by current and projected housing levels. Therefore, no adverse impacts would occur.

4.3.1.5 Mitigation Measures

Alternatives 1 and 2 would not result in a significant adverse impact with respect to population growth or housing supply and therefore mitigation measures are not required.

4.3.2 Employment and Commercial Activity

4.3.2.1 Significance Criteria

For purposes of this EIS, implementation of the project may have a significant adverse impact if it would result in a decline in commercial activity or employment in the West Los Angeles area.

4.3.2.2 Alternative 1: Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage

Economic development and job opportunities in the West Los Angeles area are a key component to the City's General Plan. Construction of Alternative 1 would create new short-term and long-term employment in the area, thus increasing the aggregate level of disposable income. As a result, implementation of Alternative 1 would result in overall beneficial impacts on the local economy.

4.3.2.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Economic development and job opportunities in the West Los Angeles area are a key component to the City's General Plan. During the construction activities of Alternative 2, there would be short-term employment in the area. Construction of Alternative 2 would result in short-term beneficial impacts on the local economy. Long-term employment would be slightly less than the No Action Alternative.

4.3.2.4 No Action Alternative

There would be short-term beneficial impacts for employment and commercial activity associated with the renovation activities at the Wilshire campus. The No Action Alternative would result in the increase of workforce on the site in the future as the office tower reaches full occupancy. This would have a beneficial long-term impact to the surrounding community.

4.3.2.5 Mitigation Measures

Alternatives 1 and 2 would not result in significant adverse impacts with respect to employment or commercial activity; therefore, no mitigation measures are required.

4.3.3 Real Estate Market and Socioeconomics

4.3.3.1 Significance Criteria

For purposes of this EIS, implementation of one of the alternatives may have a significant adverse impact on real estate market and socioeconomics if it would result in the following:

- Cause the reduction of available lease space in the West Los Angeles area
- Displace existing housing or retail/commercial tenants without providing financially comparable alternatives in the West Los Angeles area

4.3.3.2 Alternative 1: Mixed Use - Existing Facilities + Two New Buildings + New Parking Garage

Construction of the new buildings and parking garage would result in short-term beneficial impacts to the local economy through the expenditure of construction dollars. The addition of the new buildings to allow the consolidation of the FBI at the Wilshire campus will increase the space that this agency currently occupies.

The implementation of the Alternative 1 would not displace existing housing or retail/commercial tenants. The addition of employees and visitors to the Federal facilities may provide additional opportunities to businesses in the area.

4.3.3.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Upon completion of the new facilities, consolidation of the FBI currently located in leased facilities would occur. The 132,000 square feet of existing leased office space that would become available is less than 0.2 percent of the office space in the West Los Angeles office market (Colliers Seeley, 2005 Market Report). Demolition of the office tower would require the relocation of several Federal agencies (approximately 400 employees) currently in the tower to other locations throughout the Los Angeles area into other Federal facilities or leased spaces.

The implementation of the Alternative 2 would not displace existing housing or retail/commercial tenants. The addition of employees and visitors to the area may provide additional opportunities to businesses in the area.

4.3.3.4 No Action Alternative

No short-term or long-term real estate market impacts would result due to the implementation of the No Action Alternative.

4.3.3.5 Mitigation Measures

Alternatives 1 and 2 would not result in a significant adverse impact with respect to employment or commercial activity; therefore, no mitigation measures are required.

4.4 TRAFFIC AND PARKING

Coordination with Los Angeles Department of Transportation (LADOT) and input from the Traffic Working Groups meetings conducted during 2005 resulted in 72 intersections that were identified as appropriate for the traffic impact analysis. Based on field reviews of the intersections, it was noted that only 70 intersections are signalized. Signalized intersections are required for the traffic analysis methodology approved by LADOT and therefore, 70 intersections were analyzed in the traffic study for this project (Appendix C).

When analyzing the traffic impacts, the existing conditions are referred to as the baseline or base conditions. As noted in Section 3.4, under the existing (2006) conditions 25 of the 70 study intersections operate at acceptable Levels of Service (LOS) D or better, during the weekday morning and afternoon peak hours.

For the analysis of Year 2012 traffic, a background annual traffic growth rate of one percent was utilized. This annual rate was discussed and verified with LADOT staff. Similarly to the Phase 1, an annual traffic growth rate factor of one percent was also utilized to provide for increases in traffic from the existing traffic counts to reflect Year 2017 conditions. This annual rate was also discussed and verified with LADOT staff.

The same area of influence and number of related projects are included in this scenario as in Phase 1 (Year 2012). The same 72 projects were considered to potentially contribute measurable traffic volumes to the study area during the Phase 2 (Year 2017) analysis period.

The traffic impact analysis focused on Alternative 1 because, of the two alternatives, it had an increase in trip generations over baseline conditions and as a result, created significant adverse impacts. From a traffic impact analysis for proposed projects, if the trip generations are projected to be less than baseline, as was determined for Alternative 2, then LADOT does not require further analysis. For this EIS, calculations were performed to quantify the beneficial impacts to regional traffic conditions for Alternative 2.

4.4.1 Significance Criteria

The City of Los Angeles Traffic/Access Guidelines for determining significant transportation impact at an intersection is based on an increase in the volume of traffic traveling through an intersection in relation to the traffic capacity of that intersection, known as the volume/capacity (V/C) ratio. The significance criteria has a lower threshold for when an impact is significant as the LOS worsens from C to D to E and F, as noted in the chart below.

<u>Level of Service</u>	<u>Final V/C Ratio</u>	<u>Project-Related Increase in V/C</u>
C	< 0.700 – 0.800	equal to or greater than 0.040
D	< 0.800 – 0.900	equal to or greater than 0.020
E, F	< 0.900	equal to or greater than 0.010

The identification of traffic impacts is based on a planning level analysis of project alternatives. Traffic impacts at the intersections immediately adjacent to the project site will vary depending upon final layout of parking facilities and project driveways.

4.4.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

4.4.2.1 Traffic Analysis

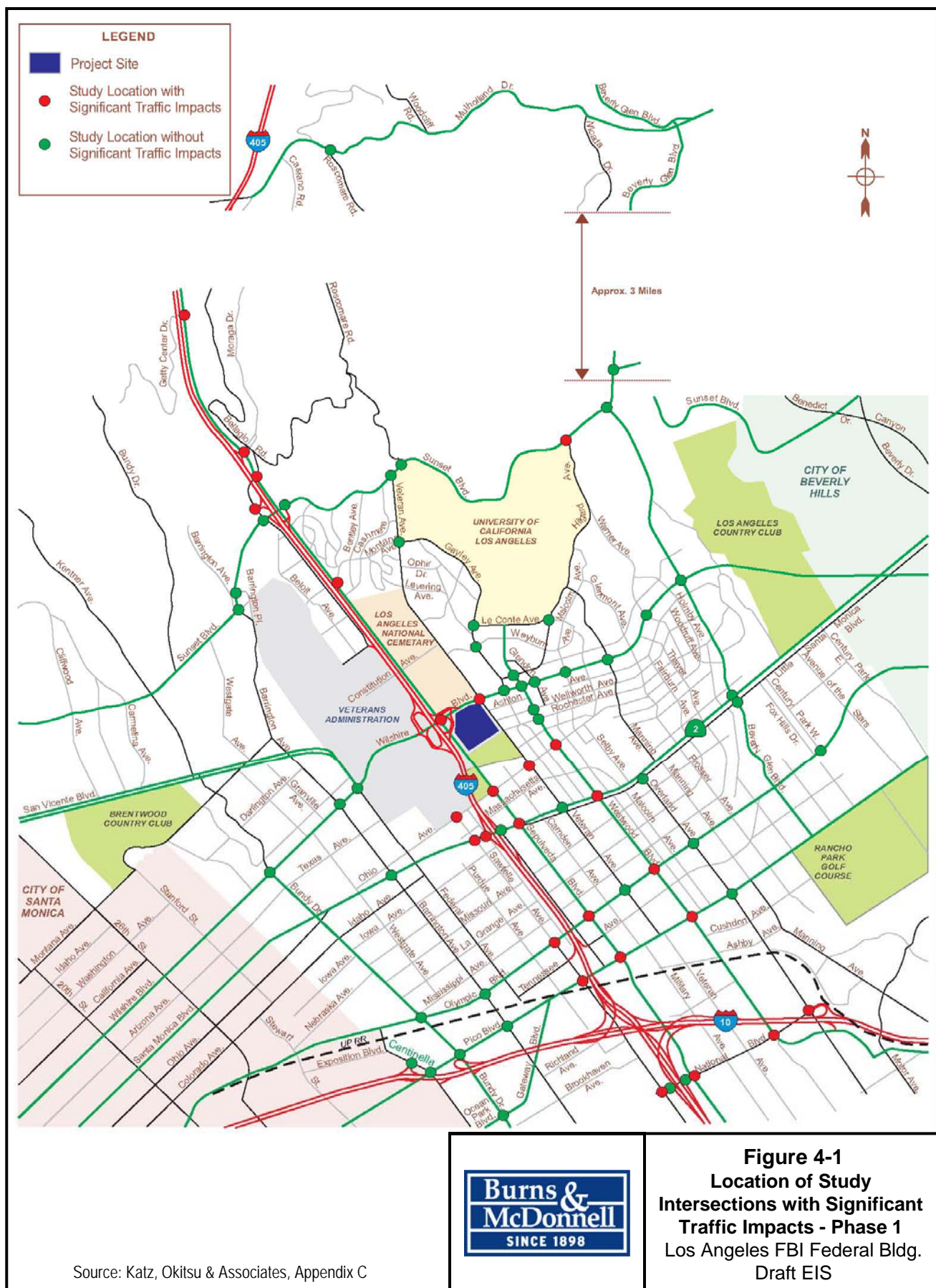
The following are the conclusions based on the analysis within Traffic Impact Study (Appendix C). Unacceptable level of service (LOS) is defined as a value of “E” or “F.” Project significant impacts were calculated by thresholds established by the City of Los Angeles Department of Transportation.

- Phase 1 (Year 2012) would generate 3,884 daily trips, of which 846 and 304 trips would be during the morning and afternoon peak hours, respectively.
- Phase 2 (Year 2017) of the Project is estimated to generate 6,094 daily trips of which 1,002 and 450 trips would be during the morning and afternoon peak hours, respectively.
- Phase 1 (Year 2012) project traffic conditions, including Alternative 1 and related projects, resulted in 60 intersections that are projected to continue to operate at poor level of service (LOS E or worse). The remaining 10 study intersections would continue to operate at an acceptable level of service (LOS D or better). See Figure 4-1.
- Phase 2 traffic conditions including and related projects, resulted in 62 study intersections that are projected to continue to operate at poor level of service (LOS E or worse). The remaining eight study intersections would continue to operate at an acceptable level of service (LOS D or better). See Figure 4-2.
- Alternative 1 would create significant traffic impacts at 30 of the 70 study intersections based on the criteria established by LADOT.

4.4.2.2 Congestion Management Plan (CMP) Conformance

The Congestion Management Program (CMP) was created statewide because of Proposition 111 and has been implemented locally by the Los Angeles County Metropolitan Transportation Authority (LACMTA). The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the proposed project will add 50 or more vehicle trips during either AM or PM weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the AM or PM weekday peak hours.



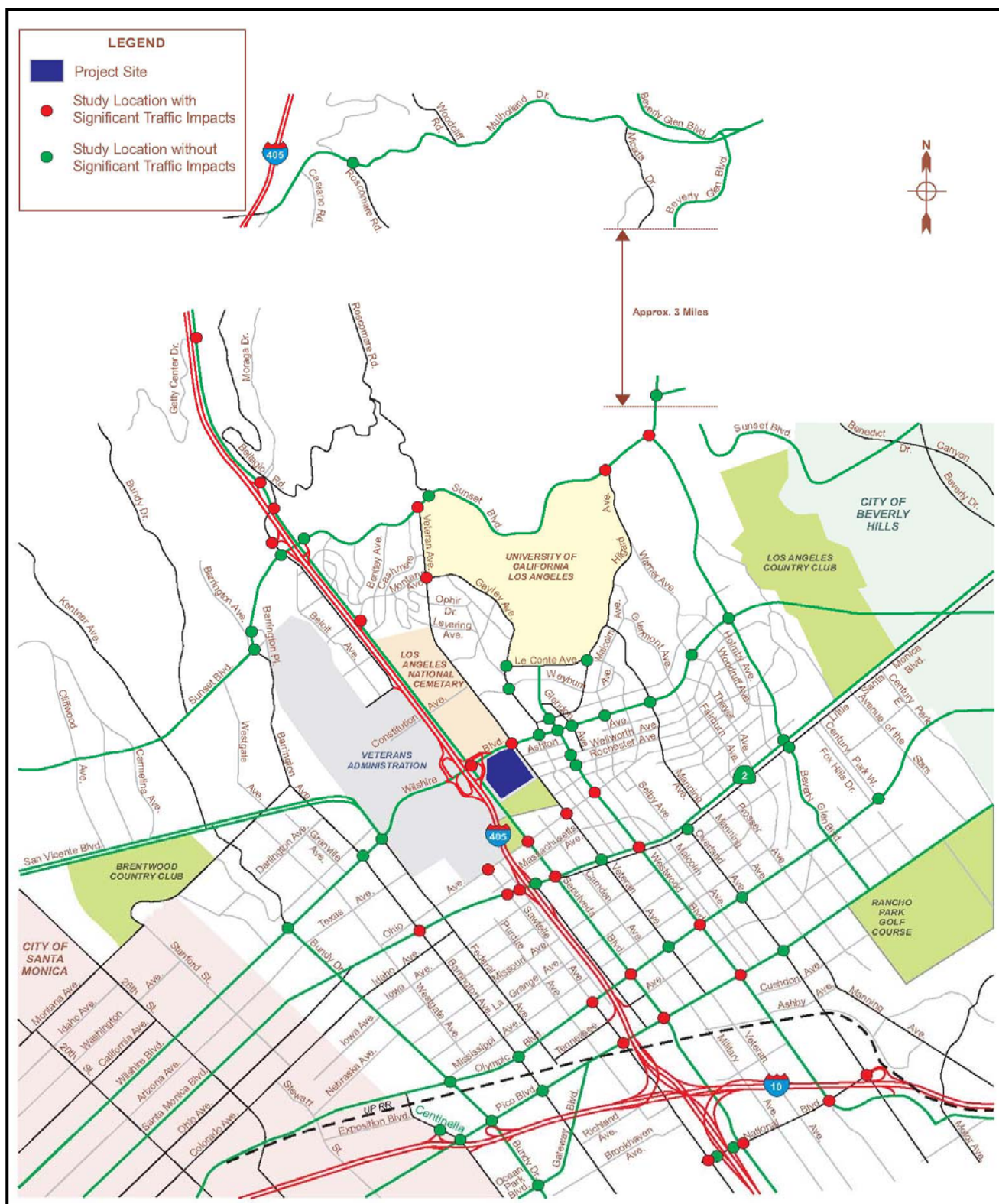


Figure 4-2
Location of Study
Intersections with Significant
Traffic Impacts - Phase 1 & 2
 Los Angeles FBI Federal Bldg.
 Draft EIS

Source: Katz, Okitsu & Associates, Appendix C

There are several CMP arterial monitoring intersections within the study area. All CMP intersections were included as part of the study intersections such as the following:

- Santa Monica Boulevard and Bundy Drive
- Wilshire Boulevard and Sepulveda Boulevard
- Wilshire Boulevard and Beverly Glen Boulevard

These CMP arterial monitoring intersections were evaluated as three of the study intersections. The traffic to be generated as a result of implementing Alternative 1 is anticipated to create significant traffic impact at this location per CMP guidelines if project-related traffic will cause service levels to deteriorate to LOS E or F and increase in demand to capacity ratio caused by the project is 2 percent or more. In comparison to the LADOT guidelines discussed in Section 6, CMP guidelines are less stringent in determining project traffic impacts. Proposed mitigation measures were considered; however, there are no feasible improvements available to mitigate the impacts.

The nearest CMP mainline freeway-monitoring location is at I-405 north of Venice Boulevard and south of Mulholland Drive, and at I-10 at Lincoln Boulevard and east of Overland Avenue. Based on the trip distribution and traffic assignment, the proposed project may add substantial trips to the freeway system. Therefore, additional analysis of CMP freeway monitoring stations was performed.

This analysis was conducted using a procedure similar to that used for the local street system. The following traffic scenarios were analyzed:

- Existing Conditions – Analysis of existing freeway traffic volumes. Peak hour volumes were obtained from the 2004 CMP for Los Angeles County (LACMTA, 2004)
- Future (Year 2012 and 2017) with Ambient Growth and Related Projects Conditions – Analysis of future year 2012 and 2017 freeway traffic volumes without the proposed project. The methodology used to develop forecasts of future freeway volumes with and without the proposed project is similar to that used for the study intersections. It includes the ambient growth of 2 percent per year and the development of future without project volumes
- Future (Year 2012 & 2017) with Ambient Growth and Related Projects with Proposed Project Conditions – Analysis of future year 2012 and 2017 freeway traffic volumes with the addition of traffic expected to be generated by the proposed project.

Demand/capacity (D/C) ratios were calculated for each freeway segment, using a capacity value of 2,000 vehicles per hour per freeway mainline lane (in accordance with CMP guidelines). Based on the significant impact criteria established in the CMP document, the proposed project would not generate significant regional freeway impacts. Although several locations are projected LOS E or worse, the increase in D/C ratio caused by the project traffic is less than the 0.02 criteria

4.4.2.3 Construction Traffic

Construction traffic impacts will be short-term adverse impacts in 2011-2012 and 2016-2017. GSA will develop a project construction traffic control plan in consultation with LADOT. The plan will include a designated haul route, designated staging area, traffic control procedures, emergency access provisions, and designated construction crew parking area.

4.4.2.4 Parking

There will be 1,950 parking spaces in the secure parking garage and secure surface parking area for the FBI. Parking for the Federal employees in the office tower and visitors to the U.S. Post Office will be accommodated on the property at 11000 Wilshire Boulevard, either on the existing lot or by creating additional surface parking on the site as part of the overall development of Alternative 1.

4.4.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Traffic impacts for Alternative 2 will be beneficial to the study area when compared to the No Action Alternative future conditions in 2012 and 2017. With a slight decrease in employees when compared to the No Action Alternative with related future projects in 2012 and 2017, the V/C ratios show an improvement at all 70 intersections, as noted in Appendix C.

Construction impacts and associated construction traffic mitigation would be the same as described for Alternative 1.

Implementation of Alternative 2 will result in all the FBI parking being located in the secure 1,950 parking spaces in the parking garage and surface lot. Approximately 205 parking spaces will remain for on the existing surface parking lot for use by visitors to the U.S. Post Office.

4.4.4 No Action Alternative

The following are the conclusions made from the analysis within this report. Unacceptable level of service (LOS) is defined as a value of "E" or "F". Project significant impacts were calculated by thresholds established by the City of Los Angeles Department of Transportation.

- During the future period (Year 2012), with ambient growth and traffic generated from related projects, the number of study intersections projected to operate at an acceptable level of service (LOS D or better) would be reduced to ten, down from the 25 under existing conditions. The remaining 60 study intersections are projected to operate at poor level of service (LOS E or worse).
- During the future period (Year 2017), with ambient growth and traffic generated from related projects, all but 62 study intersections are projected to operate at poor level of service (LOS E or worse).

4.4.5 Mitigation Measures

Measures to mitigate the significant traffic impacts associated with Alternative 1 were identified for seven locations. The feasibility of these improvements has been evaluated at the conceptual level only. The analysis of each mitigation measure does not include detailed analysis of intersection geometry or traffic signal design. If the recommended mitigations are approved, final feasibility studies, engineering, and design of each improvement would need to be undertaken.

Because Alternative 2 improved conditions when compared to the future conditions when compared to the No Action Alternative, no mitigation measures were developed.

The Los Angeles FBI Field Office Headquarters is currently implementing a more extensive use of the Alternate Work Schedules for non-FBI Agent support staff, with employees working flexible schedules outside of normal working hours. This not only benefits the employees in an effort to reduce commute time, but will also benefit the community by not traveling during peak congestion hours.

The level of service (LOS) at the significantly impacted intersections according to LADOT criteria, before and after the proposed mitigation is implemented, is summarized in Appendix C. The recommended mitigation measure would reduce the V/C ratios to levels less than significant at 4 of the 30 impacted intersections.

4.5 PHYSICAL AND BIOLOGICAL ENVIRONMENT

4.5.1 Geology and Landform

Information regarding regional geology and seismically induced hazards was taken from various sources of the California Department of Conservation and the U.S. Department of the Interior. In addition, information related to other seismic hazards, such as landslide and liquefaction zoning, was taken from California Department of Conservation, Division of Mines and Geology (CDMG) maps.

4.5.1.1 Significance Criteria

Geologic impacts were considered significant if the proposed alternatives would be subject to geologic hazards associated with fault rupture, liquefaction, soil type, or erosion. For purposes of this EIS, implementation of the proposed alternatives may have a significant adverse impact if any of the following occur:

- Expose people or structures to potential significant adverse effects, including the risk of loss, injury, or death involving as a result of:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
 - Strong seismic ground shaking
 - Seismic-related ground failure, including liquefaction
 - Landslides
- Result in substantial soil erosion or the loss of topsoil
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse
- Be located on expansive soil creating substantial risks to life or property

4.5.1.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Seismic. As described in Section 3.5.1, the site is not located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1994. However, faults considered active (e.g. Santa Monica) or potentially active that transverse the area have shown no signs of activity based on soil data (Pratt et al., 1998). In fact, the most recent well-documented Santa Monica Fault surface rupture occurred approximately 10,000 to 17,000 years ago; however, one may have occurred as recent as 1000 to 3000 years ago (Dolan et al., 1992). Because ground rupture generally only occurs at the location of a fault and no active or potentially active fault are known on the Wilshire campus, the proposed alternatives would not be subject to a substantial risk of fault (ground surface) ruptures. However, if evidence of an active or potentially active fault is discovered during preparation of a site-specific geotechnical report, the report shall address the potential hazard and provide design recommendations that shall be incorporated into the project.

The site is within a seismically active area that is bounded on the north and south by two faults of a fault zone that is expected to produce maximum credible earthquakes of magnitude 6.0 or greater. Therefore, although not located in an Alquist-Priolo zone and not subject to ground rupture, any development could be subject to substantial seismically induced ground shaking, liquefaction, or land sliding.

Erosion. Erosion can occur as a result of, and can be accelerated by, site preparation activities associated with the construction of Alternative 1. Vegetation removal in landscaped (pervious) areas could reduce soil cohesion, as well as in the buffer provided by vegetation from wind, water, and surface disturbance, which could render the exposed soils more susceptible to erosive forces. Additionally,

excavation or grading for any proposed subterranean building or parking structures may also result in erosion during construction activities. This would be true irrespective of whether hardscape previously existed at the construction site, since bare soils would be exposed and could be eroded by wind or water.

Earth-disturbing activities associated with construction would generally be considered temporary. Erosion effects would depend largely on the areas excavated, the quantity of excavation, and the length of time soils are subject to conditions that would be affected by erosion processes.

Full implementation of the alternative is anticipated to result in the conversion of permeable to impermeable surfaces, which would increase impermeable surface area on the Wilshire campus and would increase runoff. Determination of the net increase in impermeable surface area would occur once final design is completed. The anticipated increase is not expected to result in a substantial increase in operational erosion, particularly because major flow patterns on the Wilshire campus would not change and velocity of flows would, consequently, not increase. Therefore, erosion impacts would be considered to be less than significant. No mitigation is required.

Liquefaction. The CDMG indicates that the Wilshire campus lies within a potential liquefaction hazard area. A site-specific evaluation of seismic, geological, and soils characteristics to determine appropriate project design measures to address any identified constraints or hazards, including compliance with all applicable provisions of the International Building Code (IBC) (IBC, 2003) will be completed.

Summary of Impacts. The Wilshire campus is located in an area of seismic liquefaction potential, which is an adverse long-term, significant impact. However, development of the alternatives would be subject to all applicable provisions of the IBC (IBC, 2003). This impact would, therefore, be considered less than significant.

During construction of the proposed Federal facilities, storm water runoff may cause erosion in areas of exposed or stockpiled soils. This adverse impact is considered less than significant because of the existing 2 to 5 percent slope.

4.5.1.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The impacts for Alternative 2 are the same as for Alternative 1 with the exception of additional potential for soil erosion during the demolition and excavation for removal of the office tower and cafeteria. This alternative would require fill material (soil) to be brought in from an offsite source to level the ground where the demolished buildings once stood. Some additional soils may be brought to the site for landscaping.

4.5.1.4 No Action Alternative

Implementation of the No Action Alternative would not involve the demolition of facilities or construction of any new facilities. Therefore, there would be no change to the existing geologic conditions or landforms. No geologic or landform impacts are associated with the No Action Alternative. Future projects for the existing 11000 Wilshire office tower would include modifications to bring the building in line with current codes for the seismic conditions at the site.

4.5.1.5 Mitigation Measures

The following mitigation measures apply to both Alternatives 1 and 2.

The site is in an area of active seismic activity. Implementation of Alternative 1 and Alternative 2 would be subject to all applicable provisions of the IBC (IBC, 2003). This impact would, therefore, be considered less than significant.

Mitigation for liquefaction potential is required in the building designs, as defined in Public Resources Code Section 2693(c). All new structures proposed will include appropriate measures, according to current geotechnical engineering standards, to withstand or eliminate soil characteristics or constraints on the project site. Following these recommendations will ensure that this impact is less than significant. It will ensure that geological or soils hazards on particular construction sites are identified and that foundations and structures are designed according to current seismic and geotechnical engineering practice to provide adequate safety levels. A comprehensive geotechnical survey of the site will be performed prior to commencing the building design. Construction and building design measures recommended by the geotechnical engineer that performs the study will be incorporated into the overall design of the building. This impact would, therefore, be considered less than significant.

The project would implement dust control measures consistent with SCAQMD Rule 403, which would stabilize soils and prevent erosion through the reduction of dust generation by up to 85 percent. The project would comply with the NPDES general permit for construction activities, pursuant to which, as part of an erosion control plan, construction site erosion and sedimentation control best management practices (BMPs) would be implemented. These BMPs would include such measures as silt fences, watering for dust control, straw bale check dams, hydro seeding, and other measures.

4.5.2 Hydrology and Water Quality

Analyses of potential impacts to surface flows by identifying existing drainage patterns then evaluate the potential for future development to modify drainage patterns and to increase runoff. Potential impacts from implementation of the project were determined by evaluating the potential of additional development to exceed the thresholds of significance outlined below.

4.5.2.1 Significance Criteria

For purposes of this EIS, the project may have a significant adverse impact on hydrology and water quality if it would result in any of the following bulleted items.

- Violate any water quality standards or waste discharge requirements
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff
- Otherwise substantially degrade water quality
- Expose people or structures to a significant risk of loss, injury, or death involving inundation mudflow

4.5.2.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Development of Alternative 1 could result in a minor increase of impermeable surface area on site. It is anticipated that the proposed facilities would be constructed in the southwestern corner of the site, at the location of the existing parking garage and surface parking lots. The anticipated increase in storm water flows is considered insignificant for the City or County storm drainage system and would not

substantially contribute to operational erosion or sedimentation impacts. Any additional runoff generated by any increases in impermeable surface area will be directed to storm drains and would not discharge onto exposed soils.

The constituent pollutants entering the City and County storm drain systems as a result of the project would not change in character. The proposed new use of the site is identical to existing uses and would not contribute different types of pollutants than those now generated on site.

Currently, the existing facilities utilize water from the Los Angeles Department of Water and Power (LADWP), which relies on some local groundwater supplies. Consequently, the project would result in additional development that could indirectly require an increased use of groundwater through the provision of potable water by LADWP to the new facilities. However, this increase is within the established demand projections of the LADWP. Further, the existing facilities do not extract groundwater on an operational basis.

Implementation of the project would result in new buildings, landscaping, and/or other features that could result in minor alterations to existing drainage patterns on site but not substantial alterations. The project could be constructed on areas that are now impervious areas and result in no change to the existing drainage. Current patterns of drainage do not cause erosion or siltation as flows generated are directed immediately to the storm drain system.

According to the current Flood Insurance Rate Map (FIRM) published by the Federal Emergency Management Agency (FEMA), the project site lies within an area designated as Zone C, defined as an area of minimal flooding, and does not have any design requirements. Therefore, implementation of the project would have no impact on flooding.

Summary of Impacts. There will be short-term, direct adverse impacts to hydrology and water quality associated with construction activities such as site preparation, ground clearing, and excavation. No long-term or indirect impacts have been identified.

4.5.2.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The impacts associated with Alternative 1 would apply for Alternative 2, with the addition of short-term adverse impacts to drainage patterns on site during the demolition of the existing building.

4.5.2.4 No Action Alternative

Implementation of the No Action Alternative would not involve any construction activities. Therefore there would be no impacts for hydrology and water quality.

4.5.2.5 Mitigation Measures

Short-term minor adverse impacts to hydrology and water quality would occur during the construction of Alternative 1 and Alternative 2. Construction plans will be developed that implement erosion and sediment control measures. Grading and other activities involving soil displacement should, to the extent feasible, be conducted during the May-October dry season. The preparation of, and compliance with, a spill control and countermeasure plan is will be required to properly address spills of hazardous construction materials.

The project will comply with NPDES Phase I (general construction permit) requirements and implement Best Management Practices (BMPs). Compliance with these statutes and regulations would ensure that storm water quality standards would not be violated during construction by requiring discharges to meet

the requirements of the State Water Resources Control Board (SWRCB) and the California Regional Water Quality Control Board (RWQCB).

4.5.3 Vegetation and Wildlife

This section of the EIS evaluates the potential for vegetation and wildlife impacts associated with implementation of the alternatives. Data used to prepare this section came from various sources, including California Natural Diversity Database and U.S. Fish and Wildlife Service (USFWS) list of species that might occur in the area and specified locations of critical habitat.

4.5.3.1 Significance Criteria

For purposes of the EIS, implementation of the project would have a significant adverse impact on vegetation and wildlife if it would result in any of the following:

- Have substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by the USFWS
- Have a substantial adverse effect on any riparian habitat or other sensitive species identified by the USFWS

The Endangered Species Act of 1973 (as amended) directs Federal agencies to ensure that their actions will not jeopardize the existence of any Federally listed threatened or endangered species, and/or critical habitat. An impact is considered to be significant to wildlife or vegetation if it is expected to cause any reduction in population sizes of species that are considered rare, threatened, endangered, and/or sensitive by the USFWS.

4.5.3.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

The proposed project would require demolition of the existing parking garage and site clearance for construction of the new facilities that could cause a temporary loss of ornamental vegetation. Trees along the south boundary may be impacted by construction of the new facilities. The species of trees located on the Wilshire campus are widespread in the region. No threatened, endangered, or otherwise sensitive biological resources are known to occur at the Wilshire campus (CDFG, 2000).

All of the 22 species listed by the USFWS (Appendix A) that may potentially be impacted by the proposed project are species that are currently known from remote areas that occur on state or Federal lands or areas that are at the edge of current suburban developments along the San Gabriel Mountains of Los Angeles County. Designated critical habitats for the protected species listed by the USFWS are greater than one mile from the site of the proposed project, which occurs in an urban area that is surrounded by existing urban development in the Los Angeles metropolitan area. No natural habitat exists in the vicinity of the proposed project, nor is the proposed project expected to impact any of the 22 species or their critical habitats.

Summary of Impacts. There would be no significant adverse impacts to wildlife and vegetation as a result of implementing Alternative 1. Minor vegetation impacts may occur with the possibility of removing some trees for the construction of the new facilities. The trees along the south boundary create a buffer between the 11000 Wilshire Campus and Westwood Community Park.

4.5.3.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The impacts associated with Alternative 1 would apply for Alternative 2.

4.5.3.4 No Action Alternative

No new construction would occur under the No Action Alternative. Therefore, continued use of the existing structure will not result in any impacts to vegetation and wildlife.

4.5.3.5 Mitigation Measures

No impacts would occur to vegetation and wildlife. Therefore, no mitigation measures are required. However, any construction plans will be prepared to direct the least possible disturbance to the site's vegetation, especially along the south boundary.

4.5.4 Air Quality

The analysis in this section focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed alternatives.

4.5.4.1 Significance Criteria

For purposes of this EIS, implementation of the project may have a significant adverse impact on air quality if it would result in any of the following:

- Conflict with or obstruct implementation of the applicable air quality plan
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)
- Expose sensitive receptors to substantial pollutant concentrations
- Create objectionable odors affecting a substantial number of people

The South Coast Air Quality Management District (SCAQMD), the agency responsible for comprehensive air pollution control in the Los Angeles Basin, recommends that projects be evaluated in terms of air pollution control thresholds established by the SCAQMD. Table 4-2 provides the quantifiable thresholds that are currently recommended by the SCAQMD and are used to determine the significance of air quality impacts associated with proposed projects.

4.5.4.2 Construction and Operational Emissions Thresholds

The SCAQMD currently recommends that projects with construction-related and/or operational emissions that exceed any of the following emissions thresholds should be considered significant (See Table 4-2):

4.5.4.3 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

In order to determine the effects that Alternative 1 would have on traffic-related air quality near the Wilshire campus, dispersion modeling of carbon monoxide (CO) was completed. Carbon monoxide is a key indicator that is used to evaluate if there will be traffic-related air quality issues. The SCAQMD was contacted to determine the preferred method for modeling CO concentrations from mobile sources. Per SCAQMD, CALINE4 is the preferred method of modeling CO hotspots, and EMFAC2002 is the preferred model to determine the emission factors that are entered into the CALINE4 model (Koizumi 2006). Emission factors based on 3 mph were used in the EMFAC2002 modeling to give worst-case scenarios (Benson, 1989). Model inputs and assumptions were coordinated with SCAQMD.

SCAQMD recommends modeling the three worst traffic intersections, and if those intersections are below the threshold, it is assumed the others will be also. To determine the intersections to be modeled, a Level of Service (LOS) analysis was performed at the 70 intersections. The three intersections with the worst LOS are Veteran and Wilshire, Sepulveda and Wilshire, and Westwood and Wilshire. AM and PM traffic

Table 4-2
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds

Pollutant	Construction	Operational
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

Ambient Air Quality for Criteria Pollutants ^(a)

NO ₂	In attainment; significant if project causes or contributes to an exceedance of any standard:
1-hour average	0.25 ppm (state)
annual average	0.053 ppm (Federal)
PM ₁₀	
24-hour average	10.4 µg/m ³ (recommended for construction) ^(b)
	2.5 µg/m ³ (operation)
annual geometric average	1.0 µg/m ³
annual arithmetic mean	20 µg/m ³
Sulfate	
24-hour average	1 µg/m ³
CO	In attainment; significant if project causes or contributes to an exceedance of any standard:
1-hour average	20 ppm (state)
8-hour average	9.0 ppm (state/Federal)

^(a) Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

^(b) Ambient air quality threshold based on SCAQMD Rule 403.

ppm = parts per million; µg/m³ = microgram per cubic meter; mg/m³ = milligram per cubic meter; lbs/day = pounds per day; ≥ greater than or equal to

counts were conducted at each of the intersections to represent rush-hour peak traffic volume. The future traffic projections included two scenarios: future traffic without Alternative 1 traffic as a baseline and future projected traffic with the implementation of Alternative 1 (Koizumi 2006).

4.5.4.4 CO Modeling Results

Maximum CO concentrations that were modeled at each of the intersections represent the highest 1-hour concentrations at individual receptors. The results of the modeling calculations are shown in Table 4-3 and Table 4-4 for the highest 1-hour and the highest 8-hour concentrations, respectively, of the three worst intersections by time of day for each phase. The worst-case scenario includes current emission factors, the highest future traffic counts, and receptors positioned to give the highest possible concentration.

As noted in Tables 4-3 and 4-4 all modeled emissions of the worst-case scenarios are well under both the national and state standards. In addition, the baseline (Base) and projected (Project) concentrations do not differ, the increase in traffic is not sufficient enough to cause a significant increase in CO concentrations.

Overall the results show that there is not a significant increase in CO emissions due to the implementation of Alternative 1.

Table 4-3
THREE WORST INTERSECTIONS: MODELED 1-HOUR CO EMISSIONS

Intersection	Maximum 1-hour CO Concentrations in part per million (ppm)*									
	AM					PM				
	2006	Phase 1 - 2012		Phase 2 - 2017		2006	Phase 1 - 2012		Phase 2 - 2017	
		Base	Project	Base	Project		Base	Project	Base	Project
Veteran Ave & Wilshire Blvd	8.4	7.6	7.6	6.5	6.5	8.9	8	8	6.8	6.8
Sepulveda Blvd & Wilshire Blvd	8.4	7.5	7.6	6.4	6.7	8.8	7.8	7.9	6.6	6.7
Westwood Blvd & Wilshire Blvd	7.9	7.3	7.3	6.3	6.3	7.3	7.2	7.2	6.2	6.2

* The National 1-hour standard is 35 parts per million (ppm), and the California State 1-hour standard is 20 ppm.

Table 4-4
THREE WORST INTERSECTIONS: MODELED 8-HOUR CO EMISSIONS

Intersection	Maximum 8-hour CO Concentrations in part per million (ppm)*									
	AM						PM			
	2006	Phase 1 - 2012		Phase 2 - 2017		2006	Phase 1 - 2012		Phase 2 - 2017	
		Base	Project	Base	Project		Base	Project	Base	Project
Veteran Ave & Wilshire Blvd	6.7	5.4	5.4	4.5	4.5	7.1	5.7	5.7	4.7	4.7
Sepulveda Blvd & Wilshire Blvd	6.7	5.3	5.4	4.4	4.5	7.1	5.5	5.6	4.6	4.6
Westwood Blvd & Wilshire Blvd	6.3	5.1	5.1	4.3	4.3	5.8	5.0	5.0	4.24	4.24

* The National 8-hour standard is 9.5 parts per million (ppm.), and the California State 1-hour standard is 9.1 ppm.

4.5.4.5 Construction Impacts

Construction emissions can be distinguished as either on or off site. Onsite emissions generated during construction principally consist of exhaust emissions (e.g., nitrogen oxide (NO_x), Sulfur oxide (SO_x), CO, volatile organic compounds (VOC), and particulate matter less than 10 microns in size (PM₁₀)) from mobile diesel and gasoline powered construction equipment and portable auxiliary equipment, fugitive dust (e.g., PM₁₀) from disturbed soil, and evaporative emissions (e.g., VOC) from equipment refueling. Offsite emissions during the construction phase consist of exhaust emissions from worker commute trips and material transport trips to and from the construction site.

Onsite construction activities are typically divided into three distinct phases: (1) demolition and land clearing; (2) site preparation; and (3) general construction. Based on the analysis for a similar project in the SCAQMD, the total daily construction emissions are expected to exceed the daily thresholds for NO_x and PM₁₀. The other project was less in square footage of building space but similar in the amount of ground disturbance. The prime contributors were the dust during site preparation (PM₁₀) with the bulldozers and the equipment exhaust on site and transporting materials off site.

Particulate matter, in the form of TSP and PM₁₀, will be generated in the construction process. Ozone may be generated from the photochemical reaction of exhaust gases (CO and VOC's) in the atmosphere from mobile sources used during construction and vehicular traffic. Fugitive particulate matter emissions will be generated by various construction activities such as earthmoving, excavation, and grading

operations. CO and VOC emissions will also be generated from the exhaust of the construction vehicles. Other organic gaseous emissions may be emitted from solvents, adhesives, non-waterbased paints, some insulation materials, and asphaltic material. These emissions contribute to the formation of ozone in the lower atmosphere.

Since Los Angeles County is in non-attainment for both PM₁₀ and ozone, and since ambient air monitors near the study area have recorded elevated levels of these pollutants, control measures would be required to minimize air pollution generated from construction activities.

This project is expected to have a significant short-term impact on the regional air quality due to construction activities. These activities are expected to last approximately two years, and could elevate levels of ozone and PM₁₀ during periods of peak activity.

4.5.4.6 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The air quality impacts associated with Alternative 2 were not modeled for traffic-related CO because of the decrease in traffic volumes associated with this Alternative would be less than for the No Action Alternative and Alternative 1. As noted for Alternative 1, there would be short-term significant impacts associated with construction activities.

4.5.4.7 No Action Alternative

Implementation of the No Action Alternative would not involve any new construction activities and no impacts from traffic.

4.5.4.8 Mitigation Measures

SCAQMD Rule 2202 is designed to reduce mobile source emissions from employee commuting. This rule provides employers with options to meet an emission reduction target for their worksite. The Federal Government promotes the Employee Commute Reduction Program and will provide a mass transit subsidy to its employees to reduce worker trips and vehicle emissions. This program reduces vehicle trips and miles traveled by implementing carpooling, rideshare programs, public transportation vouchers, and alternative transportation.

The SCAQMD identified no feasible mitigation measures that could be implemented to reduce emissions associated with construction worker trips to and from construction sites. Health and Safety Code §40929 specifically prohibits air districts and other public agencies from requiring an employee trip reduction program making such mitigation infeasible. Furthermore, the fact that most construction workers would be coming from different parts of the district makes carpooling impractical. No other feasible measures have been identified to reduce emissions from this source.

The mitigation measures listed below are intended to minimize the emissions associated with construction activities. Construction activities to build the new facilities would be subject to SCAQMD Rule 403, which requires application of best available control measures to reduce fugitive dust emissions. The following mitigation measures have been identified for the construction phase of the project and will be implemented to the extent practicable.

- Obtain electrical power from power poles instead of electrical generators
- Use “clean” fuels for mobile construction equipment instead of diesel
- Water active portions of construction site daily
- Apply non-toxic soil stabilizers to graded areas that are will be inactive for 10 days or more
- Apply chemical soil stabilizers to all inactive construction areas
- Spread soil binders on site, unpaved roads and parking areas per SCAQMD Rule 403

- Suspend excavation and grading when wind speeds (as instantaneous gusts) exceeds 25 miles per hour
- Earth material transported off-site will be covered or trucks will maintain at least two feet of freeboard
- Paved streets adjacent to the construction site shall be swept as needed to remove dust and silt that may have accumulated as a result of construction activities
- Sweep streets if silt is carried over to adjacent public thorough fairs. Suspend grading operations during first and second stage smog alerts
- Use low emission mobile construction equipment, where feasible
- Comply with AQMP Fugitive Dust Measures
- Use low sulfur fuel for stationary construction equipment

4.5.5 Noise

This section evaluates the potential noise impacts resulting from implementation of the proposed project. This includes the potential for the project to cause a substantial temporary and/or permanent increase in ambient noise levels within or around the Wilshire campus, or to expose people to excessive noise levels. The purpose of this analysis is to evaluate the project in order to ensure that new uses are located and designed appropriately from a noise perspective and to evaluate the noise impact on the surrounding community.

The analysis in this section focuses on the nature and magnitude of the change in the noise environment associated with implementation of the proposed project. The primary sources of noise associated with the project would be construction activities for the new facilities and increased employee-related traffic volumes. Secondary sources of noise would include new stationary sources (such as heating, ventilation, and air conditioning units) and increased human activity throughout the campus.

4.5.5.1 Construction Noise Levels

The actual noise levels generated by construction, varies by site and on a daily and hourly basis, depending on the activity that is occurring, and the types and number of pieces of equipment that are operating. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. These data are presented in Tables 4-5 and 4-6. Given that noise is defined on a logarithmic scale, these noise levels diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 80 decibels (dBA) measured at 50 feet from the noise source to the receptor would reduce to 74 dBA at 100 feet from the source to the receptor, and reduce by another 6 dBA to 68 dBA at 200 feet from the source to the receptor.

4.5.5.2 Significance Criteria

For purposes of this EIS, implementation of the alternative may have a significant adverse impact on noise if it would result in any of the following:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies

4.5.5.3 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Future noise levels at the Wilshire Campus would continue to be dominated by vehicular traffic on adjacent roadways. There will be short-term noise impacts associated with construction activities. When feasible, the GSA will typically limit the hours of exterior construction activities from 7:00 a.m. to 9:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, which is consistent with the City of Los Angeles Construction Noise Ordinance (City of Los Angeles, 1973). Transportation routes may be

prescribed for all construction traffic in order to minimize the impact of this traffic (including noise impacts) on the surrounding community.

Table 4-5
NOISE RANGES OF TYPICAL CONSTRUCTION EQUIPMENT

Equipment	Noise Levels in dBA L_{eq} at 50 feet ¹
Back Hoe	73-95
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Front Loader	73-86
Generators	71-83
Jackhammers	81-98
Paver	85-88
Pile Driving (peaks)	95-107
Pneumatic Impact Equipment	83-88
Pumps	68-72
Saws	72-82
Scraper/Grader	80-93
Tractor	77-98
Trucks	82-95
Vibrator	68-82

¹Machinery equipped with noise control devices or other noise-reducing design features do not generate the same level of noise emissions as shown in this table.

Source: EPA, 1971

Table 4-6
TYPICAL OUTDOOR CONSTRUCTION NOISE LEVELS

Construction Phase	Noise Level at 50 feet (L_{eq} , dBA)	Noise Level at 50 feet with Mufflers (L_{eq} , dBA)
Ground Clearing	84	82
Excavation, Grading	89	86
Foundations	78	77
Structural	85	83
External Finishing	89	86

Source: EPA, 1971

4.5.5.4 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Vehicular traffic on adjacent roadway would continue to be the dominant noise heard at the Wilshire campus and surrounding area. There will be short-term noise impacts associated with construction and demolition. As with Alternative 1, exterior construction activities typically would be limited to hours that are consistent with the City's noise ordinances when feasible and construction traffic would be routed to minimize noise impact on the surrounding community.

4.5.5.5 No Action Alternative

The No Action Alternative would not result in any noise increase from major construction activities; therefore, no mitigation would be required. There is a potential for temporary construction noise during renovation of existing facilities.

4.5.5.6 Mitigation Measures

Both alternatives would result in short-term construction noise impacts. No long-term operational noise impacts are expected. The following mitigation measures would reduce the impacts to some degree, but noise generated by construction and demolition activities would continue to result in a short-term significant noise impact:

- Comply with the construction hours as specified by local City ordinances when feasible
- Prepare a construction related traffic plan detailing proposed haul routes and staging areas for the transportation of materials and equipment with consideration for sensitive used in nearby neighborhoods
- Ensure all construction equipment operating on site has properly operating mufflers
- Use electrically powered equipment versus internal combustion engine driven equipment, where feasible

4.6 CULTURAL CONDITIONS

Under the National Historic Preservation Act (NHPA), impact assessment involves identifying activities that could directly or indirectly affect significant resources, identifying known or expected significant resources in the area of potential effects, and determining the potential level of impacts on the resources. Interface of the NHPA and the National Environmental Policy Act (NEPA) processes involves consideration of the project alternatives' likely impacts to cultural resources. Under NEPA, impacts to historic or cultural resources are explicitly identified as attributes that must be addressed in order to measure the significance of a project's potential environmental effect. Consideration of the potential for effects and adverse effects to cultural resources is included in the current NEPA assessment. However, an adverse effect on a historic property does not necessarily equate to a significant impact under NEPA. In assessing cultural resources under NEPA, 40 CFR 1508.27 of the regulation defines "significantly" (as in an action significantly affecting the quality of the human environment) in terms of context and intensity. These elements include consideration of the impacts to the community, the importance of a site, unique characteristics, and severity of impact.

4.6.1 Significance Criteria

For purposes of the EIS, implementation of the alternative may have a significant adverse impact on cultural resources if it would result in any of the following:

- Cause a adverse change in the significance of a historical resources
- Cause a adverse change in the significance of an archaeological resource
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature
- Disturb any human remains, including those interred outside of formal cemeteries

If a resource is considered significant, the potential adverse affect to that resource must be mitigated. While avoidance is always the preferred mitigation measure for an important resource, this is not always feasible.

4.6.2 Archaeological Resources

4.6.2.1 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

As described in Section 3.6, no archaeological materials have been recovered or recorded on the Wilshire campus to date. Also, the majority of the project would occur on a previously developed site that has already been subject to disturbance for existing structures or infrastructure. However, the potential remains for excavation activities associated with the project to damage archaeological resources. The likelihood of encountering archaeological resources on the campus is considered extremely low, and this impact would be considered less than significant. Prior to site preparation, grading, or excavation, construction personnel will be informed of the potential for encountering archaeological and/or paleontological resources and provided guidance in the event of a discovery. Should a discovery be uncovered, all construction work will be halted until qualified personnel can assess the discovery, determine significance, consult with the SHPO and mitigate for impacts.

4.6.2.2 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The impacts associated with Alternative 2 would be the same as for Alternative 1.

4.6.2.3 No Action Alternative

There will be no ground disturbance from the continued use of the existing Wilshire campus. Therefore, continued use of the existing structures would not result in any impacts to archaeological resources.

4.6.2.4 Mitigation Measures

Alternatives 1 and 2 would not result in a significant adverse impact with respect to archaeological resources and therefore no mitigation would be required.

4.6.3 Historic Resources

Significant effects upon historic structures or features are evaluated by determining the presence or absence of historic status with respect to the feature in question, then determining the potential for development to affect the structure of feature if it possesses historic status.

4.6.3.1 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

As described in Section 3.6, no historic resources located within the Area of Potential Effect (APE) are listed, eligible for listing, or appear eligible for listing on the National Register of Historic Places (NRHP). Therefore, no adverse impacts are expected to historic resources.

4.6.3.2 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The impacts for Alternative 2 would be the same as for Alternative 1.

4.6.3.3 No Action Alternative

Since the No Action Alternative will not affect historic resources, no mitigation will be necessary.

4.6.3.4 Mitigation Measures

Alternatives 1 and 2 would not result in significant adverse impact with respect to historic resources and cultural resources, therefore mitigation measures are not required. Additional coordination will occur with the State Historic Preservation Officer (SHPO). If Alternative 2 is selected, further coordination will

occur with the SHPO concerning the 11000 Wilshire office tower as noted in Section 3-6 to gain concurrence whether or not it has exceptional significance.

4.7 PUBLIC SERVICES

4.7.1 Police Protection

The Los Angeles Sheriff Department (LASD) and Los Angeles Police Department (LAPD) provide police protection to the 11000 Wilshire campus. As noted in Section 3.7, LASD has responsibility for the 28-acre site, as it is located in unincorporated Los Angeles County. On site enforcement is enhanced by the presence of the Federal Protective Service on site. The LAPD has responsibility for the areas adjacent to the 11000 Wilshire campus and not part of the VA properties, which are also in unincorporated Los Angeles County and under the jurisdiction of LASD.

4.7.1.1 Significance Criteria

For purposes of this EIS, implementation of the project may have significant impacts on police services if it would cause an increase in population that resulted in inadequate staffing levels and/or the need for new or altered facilities in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.

4.7.1.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

The proposed Federal facilities would substantially increase the workforce population on the site but in relation to the West Los Angeles projected growth, this is not significant. The 11000 Wilshire Federal building will be backfilled by employees who are currently housed in other facilities throughout the region; therefore, the workforce population will increase by approximately 98 percent when compared to the No Action Alternative. This increase should not result in a significant service impact to the LASD or LAPD when compared to ambient growth in the area.

Summary of Impacts. Impacts associated with Alternative 1 implementation are considered to be less than significant.

4.7.1.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

The impacts for Alternative 2 would be the less than for as for Alternative 1, as the overall population on site would actually be less when compared to Alternative 1 and the No Action Alternative.

4.7.1.4 No Action Alternative

Implementation of the No Action Alternative would continue the use of the existing Wilshire campus to house the various agencies, including the FBI, and the 11 leased locations for FBI. Therefore, implementation of the No Action Alternative would not result in any adverse impacts to police services.

4.7.1.5 Mitigation Measures

Although the alternatives impacts would be less than significant, the following is included as a mitigation measure. There will be a temporary need for security to protect against theft of equipment, trespassing and vandalism during construction. Standard security measures during construction activities include the installation of chain-link fencing around the perimeter of the project site, and securing of all construction equipment during periods of non-use.

4.7.2 Fire Protection

Los Angeles Fire Department (LAFD) services are based on the community's needs, as determined by ongoing evaluations. When an evaluation indicates increased response time, the acquisition of equipment, personnel, and/or new stations is considered. As development occurs, the LAFD reviews environmental impact reports and subdivision applications for needed facilities. Where appropriate, construction of new facilities is required as a condition of development.

The LAFD determines adequacy of fire protection services based on, among other criteria density (i.e. population, roads, and accessibility), dollar value of property, and potential loss of life (Fukuda, 2006).

The LAFD has an average response time of approximately seven minutes (Fukuda, 2006). The standard for an urban level of service requires that an engine company arrive on the scene within five minutes, 90 percent of the time, with four fire fighters per Engine Company.

4.7.2.1 Significance Criteria

Implementation of the project may have a significant adverse impact on fire protection service if it would result in impact services based on the existing ratio of firefighters to population with relation to maintaining an acceptable service.

4.7.2.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

The Wilshire campus is served by Fire Station 37; located approximately 0.15 miles to the north. The LAFD has an average response time of approximately five minutes to the Wilshire campus (Fukuda, 2006). Furthermore, as required by the Los Angeles Municipal Code (Section 57.09.06, as amended, June 1997), the farthest point on site is not located more than 1.5 miles from the nearest engine company, which is within the maximum response distance allowed by Code for commercial, industrial, and/or high-density residential uses. The Code allows response distances to exceed 1.5 miles if new structures are constructed with automatic fire sprinkler systems, which is standard practice for all government buildings.

The quantity of water required for fire protection (i.e., fire flows) varies and is dependent upon many factors that are specific to each particular building, such as the floor area, type of construction, expected occupancy, type of activities conducted within the building, and the distance to adjacent buildings. The Fire Marshal reviews and approves all individual development plans prior to construction to ensure adequate fire flows are maintained (including localized pipe upgrades or connections required to the system), an adequate number of fire hydrants will be provided in the appropriate locations, and circulation and design features will allow adequate emergency vehicle access in compliance with the Los Angeles Municipal Code. Impacts associated with the provision of fire protection services are not considered significant.

With three fire stations possessing adequate manpower and equipment resources within close proximity to the Wilshire campus, the consideration of increased personnel and/or equipment would be unnecessary for implementation of this project. However, the potential for construction related accidents could temporarily increase the utilization of these resources.

Fire flow to the area is considered to be adequate to serve high-rise structures located in the area. However, fire flow calculations and flow tests based upon final site design would be required in order to assure adequate fire flow is provided to the new facilities.

Project design and implementation should comply with all Federal, state, and local fire codes and ordinances, including the guidelines found in the Fire Protection and Prevention Plan and the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708.

4.7.2.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Impacts relative to Alternative 2 would be similar to those impacts identified for Alternative 1. The quantity of water required for fire protection would be less than Alternative 1 because there are fewer proposed facilities for Alternative 2. As with Alternative 1, Alternative 2 is considered to have sufficient fire flow to the area and further flow calculations and flow tests would be required. Design and implementation of Alternative 2 would comply with all Federal, state and local fire codes and ordinances.

4.7.2.4 No Action Alternative

Implementation of the No Action Alternative would continue the use of the existing Wilshire campus and the leased space to house the related agencies. Therefore, project implementation of the No Action Alternative would not result in any adverse impacts to fire protection services.

4.7.2.5 Mitigation Measures

Although the alternatives impacts would be less than significant, the following are potential mitigation measures that will be finalized during design of the proposed facilities.

- Comply with the Fire Department's plot plan approval requirements regarding fire safe design features prior to building permit approval. These features may include fire lanes, fire hydrants within 300 feet of all structures, and no more than 150 feet distance from the edge of the roadway or fire lane to entrances of buildings.
- Submittal of final construction plans to the LAFD for determination of the location and number of off-site public and on-site private hydrants required.
- Site layout should include two different ingress/egress roads to accommodate major fire apparatus and provide for major evacuation during emergency situations.
- Comply with all applicable Federal, state, and local fire protection and fire prevention ordinances.
- Provide adequate address signage to LAFD to facilitate with response times.

4.8 PUBLIC UTILITIES

This section evaluates the effects on utilities and service systems related to implementation of the alternatives by identifying anticipated demand and existing and planned utility availability. For purposes of this EIS, utilities include domestic water supply, solid waste collection and disposal, wastewater conveyance and treatment, and energy (electricity and natural gas). Storm water drainage facilities are discussed in Section 4.4.2.

4.8.1 Electricity

The electrical impacts were assessed based on the ability of Southern California Edison (SCE) to support the energy needs of the new facility. Impacts are considered to be significant if the alternative's implementation would affect the ability of SCE to provide service to the Wilshire campus for each proposed alternative. Determination of significance for energy impacts were made considering the following factors.

4.8.1.1 Significance Criteria

For purposes of this EIS, implementation of the project may have a significant adverse impact on electrical service if it would:

- Require or result in the construction of new electrical facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
- Result in a determination by the electrical provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

4.8.1.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Alternative 1 implementation would result in construction of approximately 937,000 gross square feet (GSF) of occupied space, which in turn will increase the electrical demand on site. The specific design is not available for the proposed facility; therefore, exact electrical demands could not be determined.

SCE has the ability to serve the proposed facility project energy needs of the alternatives. However, the extent of infrastructure required cannot be determined until an accurate electric demand is provided to SCE. The consumption rate as well as daily and annual demands will need to be provided by the Architect before precise infrastructure needs can be calculated for the proposed project. Additionally, California has experienced shortages of power that may have some impact in supply to new customers. This shortage was temporary, although it is not known at this time whether the state electricity supplies will meet future customer demand.

Based on energy consumption rates used to calculate average annual electrical load for Alternative 1, as set forth in Table C.10, Electricity Consumption and Expenditure Intensities, in the 1999 Commercial Buildings Energy Consumption Survey, implementation of Alternative 1 would require a total annual energy consumption of approximately 25,586,000 kWh (Table 4-7). With current levels of impact approximately 10,956,500 kWh, development of Alternative 1 would result in a net increase of 14,629,500 kWh on an annual basis. It should be noted that the estimated rates that would be utilized for existing older structures and the estimated rates for new structures are the same. However, given less stringent codes at the time of their construction, the existing buildings are less energy efficient. Therefore, the analysis is conservative in that existing structures likely require more energy usage than indicated and the impact from Alternative 1 is likely to be less than described here.

The design should also be in accordance with applicable electrical codes, including the National Fire Protection Association Code and the National Electric Code.

GSA proposes to use the Leadership in Energy and Environmental Design (LEED) in the design and development of the new facilities on the Wilshire campus. LEED incorporates efficiencies in energy and water usage and reduces air emissions and solid wastes associated with the construction and operation of the buildings (USGBC, 2003).

Alternative 1 would result in an incremental increase to the local and regional demand for electrical service. The increased demand is anticipated to result in a less than significant impact on electrical resources.

4.8.1.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Implementation of Alternative 2 would result in construction of approximately 937,000 GSF of occupied space, and the demolition of 585,000 GSF of occupied space, resulting in a gain of 352,000 GSF of occupied space, which in turn will increase the electrical demand on site. The specific design is not available for the proposed facility; therefore, exact electrical demands could not be determined.

Based on energy consumption rates used to calculate average annual electrical load for Alternative 2, as set forth in Table C.10, Electricity Consumption and Expenditure Intensities, in the 1999 Commercial Buildings Energy Consumption Survey, implementation of Alternative 2 would require a total annual energy consumption of approximately 15,981,500kWh/yr (Table 4-8). With current levels of impact approximately 10,956,500 kWh, development of Alternative 2 would result in a net increase of 5,025,000 kWh on an annual basis.

Table 4-7
PROPOSED PROJECT ENERGY CONSUMPTION – ALTERNATIVE 1

Existing Land Use	Size	Consumption Rate* (kWh/sq ft/yr)	Total Energy Consumed (kWh/yr)
Existing Buildings/Facilities			
Office tower	562,000	16.3	9,160,600
Cafeteria	23,000	19.3	443,900
Parking	0	0	0
Post office	32,000	16.3	521,600
Total	617,000		10,126,100
Phase I New Construction			
New Office	230,000	16.3	3,749,000
New Storage	190,000	12.7	2,413,000
New ARMF Building	47,000	10.7	502,900
New Secured Parking Garage	297,500	2.7	803,250
Total	764,500		7,468,150
Phase 2 New Construction			
New Office	470,000	16.3	7,661,000
New Secured Parking Garage	122,500	2.7	330,750
Total	592,500		7,991,750
Grand Total	1,974,000		25,586,000

*Consumption rates are based on Table C10 of the 1999 Energy Information Administration, Commercial Buildings Energy Consumption Survey: Electricity Consumption and Expenditure Tables, for building floor space, building activity and Pacific Division.
Source: EIA, 2005

It should be noted that the estimated rates that would be utilized for existing older structures and the estimated rates for new structures are the same. However, given less stringent codes at the time of their construction, the existing buildings are less energy efficient. Therefore, the analysis is conservative in that existing structures likely require more energy usage than indicated and the impact from Alternative 2 is likely to be less than described here.

The design will be in accordance with applicable electrical codes, including the National Fire Protection Association Code, the National Electric Code, as well as City and County electrical codes where appropriate.

GSA proposes to use the Leadership in Energy and Environmental Design (LEED) in the design and development of the new facilities on the Wilshire campus. LEED incorporates efficiencies in energy and water usage and reduces air emissions and solid wastes associated with the construction and operation of the buildings (USGBC, 2003).

Alternative 2 would result in an incremental increase to the local and regional demand for electrical service. The increased demand is anticipated to result in a less than significant impact on electrical resources.

Table 4-8
PROPOSED PROJECT ENERGY CONSUMPTION – ALTERNATIVE 2

Existing Land Use	Size	Consumption Rate* (kWh/sq ft/yr)	Total Energy Consumed (kWh/yr)
Existing Buildings/Facilities Post office	32,000	16.3	521,600
Total	32,000		521,600
Phase I New Construction			
New Office	230,000	16.3	3,749,000
New Storage	190,000	12.7	2,413,000
New ARMF Building	47,000	10.7	502,900
New Secured Parking Garage	297,500	2.7	803,250
Total	764,500		7,468,150
Phase 2 New Construction			
New Office	470,000	16.3	7,661,000
New Secured Parking Garage	122,500	2.7	330,750
Total	592,500		7,991,750
Grand Total	1,389,000		15,981,500

*Consumption rates are based on Table C10 of the 1999 Energy Information Administration, Commercial Buildings Energy Consumption Survey: Electricity Consumption and Expenditure Tables, for building floor space, building activity and Pacific Division.
Source: EIA, 2005

4.8.1.4 No Action Alternative

Implementation of the No Action Alternative would not require expansion or extension of the electrical distribution facilities or increase electricity use rates at the Wilshire campus.

Existing electrical supplies and infrastructure adequately serve the facilities. Therefore, no impacts or mitigation measures would be associated with the implementation of the No Action Alternative.

4.8.1.5 Mitigation Measures

Although Alternatives 1 and 2 impacts are less than significant, the following mitigation measures are included to further reduce impacts:

- Use the LEED in the design and development of the new facilities on the Wilshire campus to incorporate efficiencies in energy and water usage and reduce air emissions and solid wastes associated with the construction and operation of the buildings (USGBC, 2003).

4.8.2 Natural Gas

SoCalGas has the ability to serve the proposed facilities energy needs at all the alternative locations. However, the extent of infrastructure required cannot be determined until an accurate demand for natural gas is provided to SoCalGas. The consumption rate as well as daily and annual demands will need to be provided by the Architect before precise infrastructure needs can be calculated for the proposed project.

4.8.2.1 Significance Criteria

For purposes of this EIS, implementation of the alternative may have a significant adverse impact on natural gas service if it would:

- Require or result in the construction of new natural gas facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
- Result in a determination by the natural gas provider which serves or may serve the campus that it has adequate capacity to serve the campus's projected demand in addition to the provider's existing commitments

4.8.2.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Implementation of Alternative 1 would result in construction of approximately 937,000 GSF of occupied space, which in turn will increase the natural gas demand on site. The specific design is not available for the proposed facility; therefore, exact natural gas demands could not be determined.

Based on natural gas consumption rates used to calculate average annual natural gas usage as set forth in Table C.16, Natural Gas Consumption and Expenditure Intensities, in the 1999 Commercial Buildings Energy Consumption Survey, operation of Alternative 1 would require a total annual energy consumption of approximately 49,167,400 cubic feet (Table 4-9). With current levels of impact approximately 20,964,400 cubic feet, development of Alternative 1 would result in a net increase of 28,203,000 cubic feet on an annual basis. It should be noted that the estimated rates that would be utilized for existing older structures and the estimated rates for new structures are the same. However, given less stringent codes at the time of their construction, the existing buildings are less energy efficient. Therefore, the analysis is conservative in that existing structures likely require more energy usage than indicated and the impact from Alternative 1 is likely even less than cited here.

Alternative 1 would result in an incremental increase to the local and regional demand for natural gas. The increased demand is anticipated to result in a less than significant impact on natural gas resources.

It is not anticipated that the additional natural gas demands for the proposed project would adversely affect natural gas service in the project area. Therefore, impacts to natural gas associated with project implementation would be less than significant.

4.8.2.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Implementation of Alternative 2 would result in construction of approximately 937,000 GSF of occupied space, which in turn will increase the natural gas demand on site. The specific design is not available for the proposed facility; therefore, exact natural gas demands could not be determined.

Based on natural gas consumption rates used to calculate average annual natural gas usage, as set forth in Table C.16, Natural Gas Consumption and Expenditure Intensities, in the 1999 Commercial Buildings Energy Consumption Survey, operation of Alternative 2 would require a total annual energy consumption of approximately 30,534,400 cubic feet (Table 4-10). With current levels of impact approximately 20,964,400 cubic feet, development of Alternative 2 would result in a net increase of 9,570,000 cubic feet on an annual basis.

Table 4-9
PROPOSED PROJECT NATURAL GAS CONSUMPTION – ALTERNATIVE 1

Existing Land Use	Size	Consumption Rate* (cubic ft/sq ft/yr)	Total Energy Consumed (cubic ft/yr)
Existing Buildings/Facilities			
Office tower	562,000	30.2	16,972,400
Cafeteria	23,000	72.2	1,660,600
Parking	0	0	
Post office	32,000	30.2	966,400
Total	617,000		19,599,400
Phase I New Construction			
New Office	230,000	30.2	6,946,000
New Storage	190,000	35.7	6,783,000
New ARMF Building	47,000	35	1,645,000
New Secured Parking Garage	297,500	0	0
Total	764,500		15,374,000
Phase 2 New Construction			
New Office	470,000	30.2	14,194,000
New Secured Parking Garage	122,500	0	0
Total	592,500		14,194,000
Grand Total	1,974,000		49,167,400

*Consumption rates are based on Table C10 of the 1999 Energy Information Administration, Commercial Buildings Energy Consumption Survey: Electricity Consumption and Expenditure Tables, for building floor space, building activity and Pacific Division.
Source: EIA, 2005

It should be noted that the estimated rates that would be utilized for existing older structures and the estimated rates for new structures are the same. However, given less stringent codes at the time of their construction, the existing buildings are less energy efficient. Therefore, the analysis is conservative in that existing structures likely require more energy usage than indicated and the impact from Alternative 2 is likely to be less than described here.

Alternative 2 would result in an incremental increase to the local and regional demand for natural gas. The increased demand is anticipated to result in a less than significant impact on natural gas resources. Implementation of Alternative 2 would result in facilities with an increase of approximately 352,000 GSF of occupied space, based on demolishing the office tower and cafeteria and constructing 937,000 GSF of occupied space, thereby increasing natural gas demand onsite. Although natural gas consumption required by the proposed Facility has not been determined, demand would primarily be associated with heating of the facility.

Table 4-10
PROPOSED PROJECT NATURAL GAS CONSUMPTION – ALTERNATIVE 2

Existing Land Use	Size	Consumption Rate* (cubic ft/sq ft/yr)	Total Energy Consumed (cubic ft/yr)
Existing Buildings/Facilities Post office	32,000	30.2	966,400
Total	32,000		966,400
Phase I New Construction			
New Office	230,000	30.2	6,946,000
New Storage	190,000	35.7	6,783,000
New ARMF Building	47,000	35	1,645,000
New Secured Parking Garage	297,500	0	0
Total	764,500		15,374,000
Phase 2 New Construction			
New Office	470,000	30.2	14,194,000
New Secured Parking Garage	122,500	0	0
Total	592,500		14,194,000
Grand Total	1,389,000		30,534,400

*Consumption rates are based on Table C16 of the 1999 Energy Information Administration, Commercial Buildings Energy Consumption Survey: Consumption and Expenditure Tables, for building floor space, building activity and Pacific Division.
Source: EIA, 2005

4.8.2.4 No Action Alternative

Implementation of the No Action Alternative would not require expansion or extension of the natural gas distribution facilities or increase natural gas use rates at the Wilshire campus.

Existing natural gas supplies and infrastructure adequately serve the facilities. Therefore, no impacts or mitigation measures would be associated with the implementation of the No Action Alternative.

4.8.2.5 Mitigation Measures

Although Alternatives 1 and 2 impacts are less than significant, the following mitigation measure is included to further reduce impacts:

- Use the LEED in the design and development of the new facilities on the Wilshire campus to incorporate efficiencies in energy and water usage and reduce air emissions and solid wastes associated with the construction and operation of the buildings (USGBC, 2003).

4.8.3 Solid Waste

In 1989, the California legislature passed the Integrated Waste Management Act (AB939), which requires all cities to divert 25 percent of their waste by 1995 and 50 percent by the year 2000. Although the actions which help the City achieve the AB939 targets significantly reduce landfill disposal, the City still

requires landfill capacity to dispose of the remaining waste (LA, 2000a). In 2000, the City's total solid waste generation was 9,110,224 tons (LA, 2000b).

Development and support of recyclable materials markets is one of the City's challenges. For the solid waste remaining after diversion, the City has a continuing need for solid waste transfer and disposal facilities. Transportation costs of waste disposal are projected to increase due to the increased distance and method of shipping waste by truck and train to remote disposal facilities (LA, 2000a).

4.8.3.1 Significance Criteria

For purposes of this EIS, implementation of the project may have a significant adverse impact on solid waste if it would:

- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs
- Comply with Federal, state, and local statutes and regulations related to solid waste

4.8.3.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Alternative 1 would generate solid waste during the demolition, construction and the operational phase. During the demolition phase, the existing parking garage would be demolished to make room for the new facilities, resulting in the need to dispose of 7,088 tons of demolition debris (Degenkolb, 1997). For the construction phase, earth material would be excavated for the foundation of the new facilities. These materials removed from the site would be used as fill for other projects in the area, or disposed of at a landfill. A licensed hazardous waste disposal expert would dispose of all hazardous materials in accordance with applicable regulation. Recycling practices will be used during the construction phase to decrease the amount of solid waste sent area landfills. Further, the impact during construction is temporary, and will not extend for the life of the project.

Alternative 1 is estimated to generate approximately 22,624 pounds of solid waste per day (ppd). Table 4-11 shows a breakdown of waste generated. With current levels of impact approximately 7,902 ppd, implementation of Alternative 1 would result in a net increase of 14,722 ppd on an annual basis. The net contribution of solid waste from this alternative is 0.029 percent of all solid waste generated in the City of Los Angeles. It is anticipated that adequate landfill capacity exists to serve the project; therefore, no impacts to solid waste are expected.

GSA will contract out for solid waste disposal as it currently does. The selection of the contractor will vary depending on which one is the successful bidder.

4.8.3.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Alternative 2 would also generate solid waste during the demolition, construction and the operational phase. During the demolition phase, the existing officers, cafeteria, and parking garage would be demolished to make room for the new facilities, resulting in the need to dispose of approximately 41,830 tons of demolition debris (Forell, 1992) that would go to a construction/debris landfill. For the construction phase, earth material would be excavated for the foundation of the new facilities. These materials removed from the site would be used as fill for other projects in the area, or disposed of at a landfill. Further, the impact during construction is temporary, and will not extend for the life of the project.

Table 4-11
ALTERNATIVE 1 ESTIMATED SOLID WASTE GENERATION

Land Use	Size	Employees	Generation Rate (lbs./unit/day)	Total Solid Waste Produced (Lbs./Day)*
Existing Buildings/Facilities				
Office tower	562,000	2,300	5.27 lbs./emp/day	12,121
Cafeteria	23,000	10	0.059 lbs./sqft/day	1,357
Parking	0	0	0	
Post office	32,000	142	5.27 lbs./emp/day	748
Total	617,000	2,452		14,226
Phase I New Construction				
New Office	230,000	540	5.27 lbs./emp/day	2,846
New Storage	190,000	65	1.5 lb/emp/day	98
New ARMF Building	47,000	35	5.27 lb/emp/day	184
New Secured Parking Garage	297,500	0	0	0
Total	764,500	640		3,128
Phase 2 New Construction				
New Office	470,000	1,000	5.27 lbs./emp/day	5,270
New Secured Parking Garage	122,500	0		0
Total	592,500	1,000		5,270
Grand Total	1,974,00	4,092		22,624

Source: CIWMB, no date.

Alternative 2 is estimated to create approximately 9,146 pounds of solid waste per day. Table 4-12 shows a breakdown of waste generated per land use. The current calculated level of solid waste generated is approximately 7,902 pounds. The implementation of Alternative 2 would result in a net increase of 1,244 pounds on an annual basis. The net contribution of solid waste from this alternative is 0.002 percent of all solid waste generated in the City of Los Angeles. It is anticipated that adequate landfill capacity exists to serve the project; therefore, no impacts to solid waste are expected.

It is not known who the collector will be or what landfill would receive the waste. As such performing an analysis of specific landfill capacity would be premature and highly speculative. The City's Bureau of Engineering continually plans for solid waste disposal, to assure that the disposal needs and recycling requirement of the City development can be met.

4.8.3.4 No Action Alternative

Under the No Action Alternative, the amount of solid waste generated at the Wilshire campus would not be impacted.

Table 4-12
ALTERNATIVE 2 ESTIMATED SOLID WASTE GENERATION

Land Use	Size	Employees	Generation Rate (lbs./unit/day)	Total Solid Waste Produced (Lbs./Day)*
Existing Buildings/Facilities				
Post office	32,000	142	5.27 lbs./emp/day	748
Total	32,000	142		748
Phase I New Construction				
New Office	230,000	540	5.27lbs./emp/day	2,846
New Storage	190,000	65	1.5 lb/emp/day	98
New ARMF Building	47,000	35	5.27 lb/emp/day	184
New Secured Parking Garage	297,500	0	0	0
Total	764,500	640		3,128
Phase 2 New Construction				
New Office	470,000	1,000	5.27 lbs./emp/day	5,270
New Secured Parking Garage	122,500	0	0	0
Total	592,500	1,000		5,270
Grand Total	1,389,000	1,782		9,146

Source: CIWMB, no date.

4.8.3.5 Mitigation Measures

The following mitigation measures may be implemented to further reduce impacts associated with the short-term demolition and construction operations:

- Salvage and recycle construction and demolition materials to the extent feasible
- Institute an on-site recycling/conservation program by distributing containers to separate recyclable materials and deposit them into larger containers to be removed by a recycling company
- Promote recycling activities through education of source reduction methods

4.8.4 Water Supply

Although steadily increasing, the rate at which water use has grown over the last ten years has been significantly reduced due to aggressive implementation of demand reduction measures throughout the City. While the annual water demand growth in the 1980's averaged 2.1 percent, the forecast provided in the current Water Plan projects only a 1.3 percent average annual growth rate over the next 20 years. (LADWP, 2005b)

To determine impacts on water supply resulting from implementation of the proposed project, the projected increase in water use was compared to LADWP water supplies in 2010 to evaluate whether

there will be an adequate and reliable source of water for the project and whether any infrastructure improvements would be necessary.

4.8.4.1 Significance Criteria

For purposes of this EIS, implementation of the proposed project may have a significant adverse impact on water supply if it would result in any of the following:

- Require or result in the construction of new water supply facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
- Result in a determination by the water supply provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitment

4.8.4.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Implementation of Alternative 1 would result in construction of approximately 937,000 GSF of occupied space, which in turn will increase water consumption on site. The specific design is not available for the proposed facility; therefore, exact water consumption could not be determined.

Implementation of Alternative 1 would require a total annual consumption of approximately 60,345 gpd of water as shown in Table 4-13. The current levels of water consumption are calculated at approximately 18,720 gpd. The development of Alternative 1 would result in a net increase of 41,625 gpd on an annual basis. This increase represents 0.007 percent of the 589 MGD currently consumed by the City. The increased consumption is anticipated to result in a less than significant impact on water treatment facilities.

4.8.4.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Implementation of Alternative 2 would result in construction of approximately 937,000 gross square feet (GSF) of occupied space and the demolition of 585,000 GSF of occupied space, resulting in a gain of 352,000 GSF of occupied space, which in turn will increase water consumption on site. The specific design is not available for the proposed facility; therefore, exact water consumption could not be determined.

The operation of Alternative 2 would require a total annual consumption of approximately 25,755 gpd of water as shown in Table 4-14. The current level of water consumption is approximately 18,720 gpd. Implementation of Alternative 2 would result in a net increase of 7,035 gpd on an annual basis. This increase represents 0.001 percent of the 589 MGD currently consumed by the City. The increased water consumption is anticipated to result in no impact on water treatment facilities.

4.8.4.4 No Action Alternative

Implementation of the No Action Alternative would not require extension or expansion of water distribution facilities and would not increase rate of water use at the existing Wilshire campus. Therefore, implementation of the No Action Alternative would not contribute to any impacts to water services and no mitigation measures are required.

Table 4-13
ESTIMATED WATER CONSUMPTION FROM ALTERNATIVE 1

Land Use	Size	No. of Employees	Generation Rate (Gallons per Unit)	Total Generation (Gallons per Day)
Existing Buildings/ Facilities				
Office building	562,000	2,300	15/person	34,500
Cafeteria	23,000	10	9/person	90
Parking	0	0	NA	0
Post office	32,000	142	15/person	2,130
Total	617,000	2,452		36,720
Phase I New Construction				
New Office	230,000	540	15/person	8,100
New Storage	190,000	65	NA	
New ARMF Building	47,000	35	15/person	525
New Secured Parking Garage	297,500	0	NA	
Total	764,500	640		8,625
Phase 2 New Construction				
New Office	470,000	1,000	15/person	15,000
New Secured Parking Garage	122,500	0	NA	
Total	592,500	1,000		15,000
Grand Total	1,974,000	4,092		60,345

¹ For projects in the City of Los Angeles, it is assumed that generation rates for water are equal to wastewater consumption rates.

Source: Metcalf & Eddy, 1991.

4.8.4.5 Mitigation Measures

Although Alternatives 1 and 2 impacts are less than significant, the following mitigation measures are included to further reduce impacts:

- Use of automatic sprinkler systems with rain sensors for landscape irrigation to avoid watering during rains.
- Use of reclaimed water to irrigate landscaped areas, where possible.
- Comply with all local and state water conservation ordinances and xeriscape ordinances, as applicable.
- Use of low-volume water fixtures in all construction.
- Use of plumbing fixtures that reduce potential water loss from leakage due to excessive wear of washers.
- Comply with any mandatory water use restrictions required by local or state entities.

Table 4-14
ESTIMATED WATER CONSUMPTION FROM ALTERNATIVE 2

Land Use	Size	No. of Employees	Generation Rate (Gallons per Unit)	Total Generation (Gallons per Day)
Existing Buildings/ Facilities Post office	32,000	142	15/person	2,130
Total	32,000	142		2,130
Phase I New Construction				
New Office	230,000	540	15/person	8,100
New Storage	190,000	65	NA	
New ARMF Building	47,000	35	15/person	525
New Secured Parking Garage	297,500	0	NA	
Total	764,500	640		8,625
Phase 2 New Construction				
New Office	470,000	1,000	15/person	15,000
New Secured Parking Garage	122,500	0	NA	
Total	592,500	1,000		15,000
Grand Total	1,389,000	1,782		25,755

¹ For projects in the City of Los Angeles, it is assumed that generation rates for water are equal to wastewater consumption rates.
Source: Metcalf & Eddy, 1991.

4.8.5 Wastewater

The Hyperion Treatment Plant (Plant) is the City of Los Angeles's oldest and largest wastewater treatment facility, providing service to nearly all of the entire City of Los Angeles, as well as several contract cities. The Plant was initially built as a raw sewage discharge point into the Santa Monica Bay but, upgraded over the years to partial secondary treatment (1950), and most recently to full secondary treatment (1998). The Plant has a dry weather capacity of 450 MGD for full secondary treatment and an 850 MGD wet weather capacity. Current flow is 340 MGD. (LA, 2005b)

4.8.5.1 Significance Criteria

The project impacts were assessed based on the Plant's ability to support the wastewater needs required by the development of a new facility. The impacts were considered to be significant if the project implementation would affect the overall ability for the Plant to service each of the alternative sites.

Determination of significance for wastewater impacts were made considering the following factors.

- Require or result in the construction of new wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects
- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board

- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments

4.8.5.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Implementation of Alternative 1 would result in construction of approximately 937,000 GSF of occupied space which in turn will increase the wastewater flows on site. The specific design is not available for the proposed facility; therefore, exact wastewater flows could not be determined.

Implementation of Alternative 1 would require a total annual flow of approximately 60,345 gpd of wastewater as shown in Table 4-15. The current level of wastewater generation is calculated at approximately 18,720 gpd. Implementation of Alternative 1 would result in a net increase of 41,625 gpd on an annual basis. This increase represents 0.01 percent of the 340 MGD currently treated by the Hyperion Sewage Treatment Plant. The increased flow is anticipated to result in a less than significant impact on wastewater treatment facilities.

Table 4-15
WASTEWATER GENERATION FROM ALTERNATIVE 1

Land Use	Size	No. of Employees	Generation Rate (Gallons per Unit)	Total Generation (Gallons per Day)
Existing Buildings/ Facilities				
Office building	562,000	2,300	15/person	34,500
Cafeteria	23,000	10	9/person	90
Parking	0	0	NA	0
Post office	32,000	142	15/person	2,130
Total	617,000	2,452		36,720
Phase I New Construction				
New Office	230,000	540	15/person	8,100
New Storage	190,000	65	NA	
New ARMF Building	47,000	35	15/person	525
New Secured Parking Garage	297,500	0	NA	
Total	764,500	640		8,625
Phase 2 New Construction				
New Office	470,000	1,000	15/person	15,000
New Secured Parking Garage	122,500	0	NA	
Total	592,500	1,000		15,000
Grand Total	1,974,000	4,092		60,345

¹ For projects in the City of Los Angeles, it is assumed that generation rates for water are equal to wastewater consumption rates.

Source: Metcalf & Eddy, 1991.

4.8.5.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Implementation of Alternative 2 would result in construction of approximately 937,000 GSF of occupied space, and the demolition of 585,000 GSF of occupied space, resulting in a gain of 352,000 GSF of occupied space, which in turn will increase the wastewater flows on site. The specific design is not available for the proposed facility; therefore, exact wastewater flows could not be determined.

The implementation of Alternative 2 would require a total annual flow of approximately 25,755 gpd of wastewater as shown in Table 4-16. The current level of wastewater generation is calculated to be approximately 18,720 gpd. Implementation of Alternative 1 would result in a net increase of 7,035 gpd on an annual basis. This increase represents 0.002 percent of the 340 MGD currently treated by the Hyperion Sewage Treatment Plant. The increased flow is anticipated to result in no impact on wastewater treatment facilities.

**Table 4-16
WASTEWATER GENERATION FROM ALTERNATIVE 2**

Land Use	Size	No. of Employees	Generation Rate (Gallons per Unit)	Total Generation (Gallons per Day)
Existing Buildings/ Facilities				
Post office	32,000	142	15/person	2,130
Total	32,000	142		2,130
Phase I New Construction				
New Office	230,000	540	15/person	8,100
New Storage	190,000	65	NA	
New ARMF Building	47,000	35	15/person	525
New Secured Parking Garage	297,500	0	NA	
Total	764,500	640		8,625
Phase 2 New Construction				
New Office	470,000	1,000	15/person	15,000
New Secured Parking Garage	122,500	0	NA	
Total	592,500	1,000		15,000
Grand Total	1,389,000	1,782		25,755

¹ For projects in the City of Los Angeles, it is assumed that generation rates for water are equal to wastewater consumption rates.
Source: Metcalf & Eddy, 1991.

4.8.5.4 No Action Alternative

Implementation of the No Action Alternative would not require extension or expansion of sewer infrastructure and would not increase wastewater generation at the existing Wilshire campus. Therefore,

implementation of the No Action Alternative would not contribute to any potential impacts to wastewater services and no mitigation measures are required.

4.8.5.5 Mitigation Measures

Impacts related to the Alternatives are anticipated to be less than significant. However, incorporation of the following mitigation measures would further reduce any potential impacts:

- Implement all water-conserving measures outlined in Section 4.7.4.5
- Conduct flow test of downstream sewer lines to determine whether existing sewer lines have adequate capacity

4.8.6 Storm Water

The majority of the Wilshire campus is currently paved and developed with parking lots and existing structures. Most of the surfaces are impermeable, except for a landscaped area that surrounds the office tower, post office, and cafeteria. Storm water runoff from the campus generally drains from north to south. The Wilshire campus is served by a series of storm drains located along Veteran Avenue and Sepulveda Boulevard.

4.8.6.1 Significance Criteria

For purposes of this EIS, implementation of the proposed project may have a significant adverse impact on storm water if it would result in any of the following:

- Generates a demand for storm drain facilities that cannot be adequately accommodated by existing or planned facilities
- Discharges associated with the project would create pollution, contamination, or would cause regulatory standards to be violated as defined in the applicable NPDES storm water permit or Water Quality Control Plan for the receiving water body

4.8.6.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

During the construction phase of Alternative 1, construction materials such as adhesives, cleaning agents, plumbing materials, demolition debris, heating/cooling machinery, masonry material, floor and wall coverings, etc., may contain pollutants that can be transported through runoff. Proper handling and storage of such materials would mitigate any potential impacts to a less than significant level. In addition, storm water pollution may occur during construction through sedimentation. Grading activities can expose soils that are more susceptible to erosion. BMPs from the SWPPP should be designed to limit the amount of sediment entering the storm drain system, controlling runoff so that sediment is captured before the storm water leaves the site and enters the storm drain system.

The majority of the existing site is currently covered with impermeable surfaces, including parking lots and structures. All of the storm water on site is conveyed to the storm drain system through the gutters of the buildings and sheet flow over the parking lot surfaces. Implementation of Alternative 1 would not result in a substantial increase in flows. The new buildings would be located in areas that are currently impermeable surfaces. Implementing BMPs that address drainage design considerations by diverting runoff into landscaped area, and away from paved surfaces will help minimize the amount of runoff.

4.8.6.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Impacts to storm water during the construction phase would be similar to Alternative 1. Construction materials would need to be handled accordingly and the proper BMPs designed and used.

Operational impacts would be similar to the existing conditions. Alternative 2 would not generate storm water run-off in excess of the existing conditions of the site because it is likely to be constructed on areas that currently have impermeable surfaces. It is likely to be less than the No Action Alternative because the site of the existing 11000 Wilshire Federal Building will be turned into greenspace. The majority of the run-off from the project would be from roof top drainage, sidewalks, driveways and other impermeable surface drainage, which would flow through existing municipal storm drain facilities.

4.8.6.4 No Action Alternative

Implementation of the No Action Alternative would not require extension or expansion of the storm water drainage system the existing Wilshire campus. Therefore, implementation of the No Action Alternative would not contribute to any potential impacts to storm water and no mitigation measures are required.

4.8.6.5 Mitigation Measures

NPDES requirements will be incorporated into the design of the Alternative. These design features may include:

- Comply with NPDES requirements for a storm water drain permit along with a SWPPP
- Implement storm water BMPs to retain the runoff from storm events (a signed certificate from a licensed civil engineer or architect is required for the proposed BMPs)
- Collect and transfer all site drainage to the street in non-erosive drainage devices
- Stencil all storm drain inlets and catch basins with the project area with prohibitive language and /or graphical icons to discourage illegal dumping
- Store trash dumpster either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids
- Avoid ponding of water anywhere on the site, especially against any foundation or retaining wall

4.9 HAZARDOUS MATERIALS

The analysis in this section focuses on the use, generation, disposal, transport, or management of hazardous or potentially hazardous materials on the Wilshire campus. Disposal options, the probability for risk of upset, and severity of consequences to people or property associated with the increased use, handling, transport, and/or disposal of hazardous materials associated with implementation of the proposed project are also analyzed.

4.9.1 Significance Criteria

For purposes of this EIS, implementation of the proposed project may have a significant adverse impact on hazards and hazardous materials if it would result in any of the following:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
- Be located on a site which is included on a list of hazardous materials sites complies pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

If hazardous substances occur in site soils or structures, excavation and construction would have the potential to impact onsite workers and/or the public. Short-term project impacts are, therefore, considered

significant if any existing hazardous substances are identified during excavation activities and not properly remediated.

Long-term impacts are considered potentially significant if remediation is required and not conducted prior to project occupancy. Once the proposed facility becomes occupied, remediation would potentially expose site employees and visitors to hazardous materials.

4.9.2 Alternative 1: Mixed Use – Existing Facilities + Two New Buildings + New Parking Garage

Asbestos and lead based paint have been identified in specific areas of the Wilshire campus. A pre-demolition inspection would be completed on those buildings designated for demolition and filed with the South Coast Air Quality Management District. Removal and disposal would be performed by a licensed abatement contractor in accordance with applicable environmental asbestos abatement measures. These measures are required to ensure the health and safety of construction workers and those in the surrounding community. Following procedures outlined in Federal and state laws will assure no significant impact will result from asbestos or lead based paint due to the demolition.

4.9.3 Alternative 2: FBI Only – Two New Buildings + USPO + New Parking Garage

Demolition of the office tower, cafeteria, and parking garage would generate the most amount of hazardous waste. Asbestos tile, mastic, and fireproofing within the office tower and cafeteria must be removed before demolition. A pre-demolition inspection would be completed on those buildings designated for demolition and filed with the South Coast Air Quality Management District. Removal and disposal would be performed by licensed abatement contractors in accordance with applicable environmental abatement measures. Additionally, any solvents, chemicals, or hazardous materials used in the auto shop must be disposed of properly. This alternative may also require the removal of some soil that has been contaminated in order to demolish buildings.

4.9.4 No Action Alternative

The hazardous materials and hazardous waste conditions at the Wilshire campus would not be affected by continued operations at these buildings.

4.9.5 Mitigation Measures

Impacts related to the Alternatives are anticipated to be less than significant. However, incorporation of the following mitigation measures would further reduce any potential impacts:

- Comply with all applicable state and Federal asbestos containing materials abatement policies and procedures for removal of asbestos present on site
- Comply with all applicable state and Federal lead-based paint containing material policies and procedures for removal of lead-based paint present on site

4.10 NATURAL DEPLETABLE RESOURCES

Use of natural depletable resources (nonrenewable resources) during initial and continued phases of a project may be irreversible, since a large commitment of these resources makes removal or nonuse thereafter unlikely. Primary impacts and secondary impacts generally commit future generations to similar uses.

A project, would result in significant irreversible environmental changes if

- Both primary and secondary impacts commit future generations to similar uses

- The project involves a large commitment of nonrenewable resources
- Irreversible damage could result from any potential environmental accidents associated with the project
- The estimated consumption of resources is not justified and involves the wasteful use of energy.

Implementation of Alternative 1 or Alternative 2 on the Wilshire campus would result in the continued commitment of the campus to government-related uses, thereby precluding any other uses for the foreseeable future of the campus. The Federal government's ownership of the Wilshire campus represents a long-term commitment of the campus to government use. Restoration of the campus to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment.

Resources permanently and continually consumed include water, electricity, natural gas, and fossil fuels. The amount and rate of consumption would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources.

Construction of new Federal facilities will result in the irreversible and irretrievable commitment of resources. The new facilities will require the consumption of cement, steel and other metals, and wood products used for the building foundation and structure. The equipment that will be used during construction requires petroleum products for fuel. When the buildings are occupied and in operation, on-going resources used in daily operations will include natural gas and/or coal to generate electricity, natural gas for heating systems, and water for the restrooms and cafeteria.

The transportation, storage and disposal of hazardous wastes will be handled according to all applicable state and Federal laws, practices, and procedures. This reduces the likelihood and severity of accidents resulting in irreversible environmental damage.

4.11 UNAVOIDABLE ADVERSE IMPACTS

Construction of the proposed facility would result in significant environmental impacts to traffic under Alternative 1. Some of the significant adverse impacts related to traffic can be partially reduced through proposed mitigation measures identified in Appendix C. However, some of the impacts to traffic are either unmitigable or remain significant even with mitigation.

Under the No Action Alternative, if FBI operations remain at the Wilshire campus, there will be no unavoidable adverse impacts when compared to the existing conditions.

4.12 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USE OF HUMAN ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Implementation of either Alternative 1 or Alternative 2 will result in short-term and long-term impacts. Over the short-term, the human environment will experience an increase in noise and degradation of air quality due to construction activities under Alternative 1 and Alternative 2. Over the long-term, traffic would be significantly adversely impacted by the Alternative 1 but there would be beneficial impacts under Alternative 2. Under the No Action Alternative, the FBI Field Office Headquarters would continue to operate inefficiently at separate facilities.

4.13 CUMULATIVE IMPACTS

This cumulative impact analysis evaluates the effects of implementing the proposed alternatives in association with past, present and reasonably foreseeable future actions at the Wilshire campus. As noted in Section 2 and Appendix B, efforts to locate a suitable alternative site did not result in any viable site for the proposed FBI Field Office Headquarters within the delineated area. GSA has determined that the Wilshire campus is the preferred site for the FBI Field Office Headquarters.

As noted in the Environmental Consequences Summary Matrix (Table 4-1), for Alternatives 1 and 2 most of the impacts fall in the category of no adverse impacts, except for traffic, or for those related to construction activities as short-term impacts.

The study area for this cumulative impacts analysis is the three-mile area identified for the future projects as listed in Table 3-1.

- Past actions are defined as actions within the cumulative analysis area and include past actions at the Wilshire campus and past demographic, land use and development trends.
- Present Actions include current activities at the 11000 Wilshire campus and within a three-mile radius. The characteristics and results of these past and present actions are described in Section 3, Affected Environment.
- Reasonably foreseeable future actions are limited to those that can be identified and defined with respect to timeframe and location. For this EIS, this includes projects planned within a three-mile radius from the Wilshire campus for the next five years that have been coordinated with LADOT. There may be smaller projects that are proposed but are below the threshold for LADOT that require a traffic impact analysis. This is reasonable because traffic is a key concern for all who reside, work or drive through in this area. Reasonably foreseeable actions considered in the cumulative impact analysis include the continuation of present management actions at 11000 Wilshire Boulevard, including building repairs/renovations and the continuation of development trends in the surrounding area. Table 3-1 presents a list of the 72 planned projects that are scheduled to occur over the next five years. Figure 3-6 illustrates the location of these projects relative to the Wilshire campus.

The urban development in the study area has been steadily increasing for many years and there is very little open space left for new development. It is a dynamic area and development of new projects is constantly occurring. Some of the new development occurs through the demolition of existing buildings and the construction of new buildings in the same space. As an example, UCLA, located to the northeast of the 11000 Wilshire campus continues to build new facilities and expand facilities on currently owned property as well as recently purchased property. This extensive development, in terms of quantity and varied locations, is programmed to continue.

The cumulative impacts analysis for each major category analyzed in Section 4 is presented below.

4.13.1 Land Use and Planning

In the surrounding three-mile area 72 projects have been identified, with at least 6.6 million square feet of building space plus the addition of 6,800 dwelling unit. These projects will continue the development and redevelopment occurring within this area. The FBI Field Office Headquarters will be a part of that trend.

If Alternative 1 is selected it will contribute to the overall development patterns already established and ongoing in the area. More intense development of the 11000 Wilshire Boulevard site would be a continuation of the commercial development along the south side of Wilshire Boulevard and east of the

site. Even so, this 28-acre site would still be substantially underdeveloped in relation to the commercial properties located east on Wilshire Boulevard.

With Alternative 2, there would be a smaller net gain in office space as a result of the demolition of the existing 11000 Wilshire office tower and therefore less of an incremental increase in commercial development than Alternative 1.

4.13.2 Visual and Aesthetics

The visual qualities of the intensely urbanized corridor along Wilshire Boulevard would not be noticeably impacted by the proposed new facilities associated with Alternatives 1 or 2. The new office building and parking garage would contribute a small amount to the present built environment within the three-mile area. None of the other 72 projects are close enough to the Wilshire campus to cause additional impacts to views from the properties adjacent to the campus.

4.13.3 Socioeconomics

In conjunction with the other 72 projects identified for the three-mile radius from the project, this project will contribute to short-term economic beneficial expenditures to the economy, through the direct and indirect flow of money for labor, materials and supplies during construction.

If Alternative 1 is selected it will also add to the cumulative workforce population within the area. Alternative 1 would have an increase of 2,025 employees on the Wilshire campus when compared to the No Action Alternative. If Alternative 2 is selected it will decrease the labor population in the area by 285 when compared to the No Action Alternative projections.

Implementation of either alternative will release approximately 132,000 square feet of office space onto the market place, which is less than 0.2 percent of the total office space in West Los Angeles market, as the FBI moves out of 11 leased spaces and into the their new facilities at the Wilshire campus.

4.13.4 Traffic and Parking

As noted in Section 4.4, traffic is going to become worse within the three mile project area based on the other 72 projects proposed. Continued development is going to occur as it has in the past, with or without the proposed project at 11000 Wilshire Boulevard. The results of the Traffic Study (Appendix C) indicate that, in 2017, under the No Action Alternative there will be an increase of 15 intersections going to LOS E or F as result of ambient growth and impacts associated with the 72 planned projects. There would be an incremental increase of two additional intersections going to LOS E or F if Alternative 1 is selected. Implementation of Alternative 2 would show improvements at all 70 study intersections.

Construction traffic associated with this project will be only one of 72 projects that will have construction traffic in a three-mile area in the next five years and are of sufficient magnitude to warrant consideration by LADOT. Each project will be required to have a construction traffic management plan approved by LADOT.

4.13.5 Physical Environment

Within the physical environment category there would be several areas that demonstrate short-term impacts that will occur during construction. But these impacts are generally the same for Alternative 1 or Alternative 2 and similar to the other 72 projects.

All of the planned projects would require governmental approvals of grading plans, design, and enforcement of mitigation measures where needed to prevent erosion and surface runoff. A review of the

1 effects on soils and geology from past, present, and reasonably foreseeable future actions and the
2 proposed alternatives indicated that there may be minor cumulative impacts, primarily to soil as a result
3 of erosion. Through the use of best management practices such as silt fences or protective covering
4 minimizes the potential effects of erosion during demolition/construction activities. Therefore, no long-
5 term adverse cumulative impacts are expected

6 The Wilshire campus is located on the Federal property within a highly urbanized area. No threatened or
7 endangered species or their habitat is known to occur in nearer than approximately one mile from the
8 Wilshire campus. Therefore, there will be no incremental increase in impacts to sensitive species as a
9 result of implementing either Alternative 1 or Alternative 2. No adverse impacts cumulative impacts to
10 threatened, endangered, or otherwise sensitive biological resources are expected.

11 From a cumulative analysis, the AQMP anticipates growth and associated construction in the region,
12 consistent with SCAG projections. Each of the 72 planned future projects will also be evaluated as part
13 of their building approval process and mitigation measures applied to reduce air quality impacts, where
14 appropriate, such as dust control.

15 Construction worker transportation vehicles and the operation of construction equipment at the Wilshire
16 campus from the proposed alternatives would cause short-term increases in emissions. Once the
17 demolition, renovation, and construction activities are completed, emissions would subside and ambient
18 air quality would return to pre-construction levels.

19 As indicated by the analysis of vehicle emissions impacts associated with Alternatives 1 and 2, predicted
20 carbon monoxide levels did not cross the threshold that would create an impact or require additional
21 analysis for either alternative. The incremental increase in traffic from Alternative 1 will be minor when
22 compared to the total amount of traffic generated by the other 72 projects.

23 Implementation of Alternatives 1 or 2 will create noise impacts during construction. None other 72
24 planned projects are near the Wilshire campus and as such, construction noise from concurrent projects
25 will not result in combined increase in temporary construction noise levels at any one location.

26 It is possible that trucks hauling debris or materials from the Wilshire campus could combine with other
27 projects and result in traffic noise level increases during concurrent construction.

28 **4.13.6 Cultural Resources**

29 No impacts to cultural resources have been identified for this project and as such there will be no
30 incremental impacts to cultural resources resulting from the implementation of Alternatives 1 or 2.
31 Coordination with the SHPO is occurring. The evaluation of cultural resource impacts for the other 72
32 projects is unknown but each project will be reviewed by the SHPO during the project approval process if
33 a property listed on the NRHP is involved.

34 **4.13.7 Public Services**

35 General growth and development within the area surrounding the Wilshire campus are expected to
36 contribute to a cumulative increase in the demand for facilities and services. If all the planned projects
37 are constructed, development will increase the resident and workforce population. Each of the 72 planned
38 projects will be reviewed for public service impacts as part of their approval process.

39 The adequacy of fire protection services is based on required fire flow, response distance from existing
40 fire stations, equipment access and the LAFD's judgment regarding needs and service in the area. Each
41 of the planned projects would be reviewed by the LAFD for impacts to water pressure, distance projects

are from fire stations and the need for sprinkler systems, fire equipment access to the sites, and potential additional needs such as staffing, equipment, and training.

4.13.8 Public Utilities

There are planned improvements relating to the utility system distribution and collection systems are underway and considering the fact that the existing water treatment plant facilities have adequate capacity to serve all current and foreseeable future needs, no adverse impacts are expected to occur.

Energy, communication systems, and solid waste disposal services are provided by resources independent of the City of Los Angeles and will be adjusted by the suppliers to meet the increased demand.

4.13.9 Hazardous Materials

Development and redevelopment is occurring at many locations in the study area, as indicated by the 72 planned projects. These planned projects must be individually evaluated for hazardous materials as part of their approval process. Mitigation measures would be required on an individual planned project basis. Use and disposal of hazardous materials for the 72 planned projects will be in accordance with appropriate Federal, state and local regulations. The same regulation will apply to Alternatives 1 and 2. Alternative 2 will add more hazardous waste to the overall waste stream because of the demolition of the 11000 Wilshire office tower.

4.13.10 Natural and Depletable Resources

As noted in Section 4.10, Alternative 1 or 2 will use raw foundation and building materials during construction. When analyzed in conjunction with the other 72 planned projects in the study area, the incremental amounts for Alternatives 1 or 2 are minor. The area is highly urbanized and no extraction of mineral or depletable resources is present at Wilshire campus or in the three-mile surrounding area. There will be consumptive use of materials from the region and outside the region for certain building materials.
